

## **Exhibit 4**



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**CONTAINS CONFIDENTIAL DOCUMENTS**

# **Transcript of Kathleen (Katy) Hoffman, Corporate Representative**

**Date:** September 6, 2024

**Case:** Phillips, et al. -v- Rector and Visitors of the University of Virginia, et al.

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CONTAINS CONFIDENTIAL DOCUMENTS

Transcript of Kathleen (Katy) Hoffman, Corporate Representative 1 (1 to 4)

Conducted on September 6, 2024

|  |   |
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| <p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE WESTERN DISTRICT OF VIRGINIA</p> <p>3 Charlottesville Division</p> <p>4 -----X</p> <p>5 DWAYNE PHILLIPS, et al., :</p> <p>6 Plaintiffs, :</p> <p>7 - vs. - : Civil Action No.:</p> <p>8 RECTOR AND VISITORS OF THE : 3:22cv00075-RSB</p> <p>9 UNIVERSITY OF VIRGINIA, :</p> <p>10 et al., : *CONTAINS CONFIDENTIAL</p> <p>11 Defendants. : DOCUMENTS*</p> <p>12 -----X</p> <p>13 RULE 30(B)(6) DEPOSITION OF RECTOR AND VISITORS OF</p> <p>14 THE UNIVERSITY OF VIRGINIA,</p> <p>15 BY AND THROUGH ITS CORPORATE REPRESENTATIVE,</p> <p>16 KATHLEEN "KATY" HOFFMAN</p> <p>17 Charlottesville, Virginia</p> <p>18 Friday, September 6, 2024</p> <p>19 9:39 a.m.</p> <p>20 Job No.: 551155</p> <p>21 Pages: 1 - 102</p> <p>22 Reported by: Michelle L. Lonas, RPR, CCR</p> | <p>3</p> <p>1 A P P E A R A N C E S</p> <p>2 ON BEHALF OF THE PLAINTIFFS:</p> <p>3 SAMUEL DIEHL, ESQUIRE</p> <p>4 CROSSCASTLE PLLC</p> <p>5 14525 Highway 7</p> <p>6 Suite 345</p> <p>7 Minnetonka, MN 55345</p> <p>8 (612) 429-8100</p> <p>9</p> <p>10</p> <p>11 ON BEHALF OF THE DEFENDANT THE RECTOR AND</p> <p>12 VISITORS OF THE UNIVERSITY OF VIRGINIA:</p> <p>13 WENDY C. McGRAW, ESQUIRE</p> <p>14 HUNTON ANDREWS KURTH LLP</p> <p>15 Riverfront Plaza, East Tower</p> <p>16 951 East Byrd Street</p> <p>17 Richmond, Virginia 23219</p> <p>18 (804) 788-7221</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> |
| <p>2</p> <p>1 Rule 30(b)(6) Deposition of RECTOR AND</p> <p>2 VISITORS OF THE UNIVERSITY OF VIRGINIA, by and through</p> <p>3 its Corporate Representative, KATHLEEN "KATY" HOFFMAN,</p> <p>4 held at the law offices of:</p> <p>5</p> <p>6 WILLIAMS MULLEN (CHARLOTTESVILLE)</p> <p>7 323 2nd Street, SE</p> <p>8 Suite 900</p> <p>9 Charlottesville, Virginia 22902</p> <p>10 (434) 951-5700</p> <p>11</p> <p>12</p> <p>13 Pursuant to agreement, before Michelle L.</p> <p>14 Lonas, Registered Professional Reporter, Certified</p> <p>15 Court Reporter, and Notary Public of the Commonwealth</p> <p>16 of Virginia.</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>   | <p>4</p> <p>1 A P P E A R A N C E S (C O N T ' D.)</p> <p>2 ON BEHALF OF DOE DEFENDANT NO. 1:</p> <p>3 MATTHEW B. KIRSNER, ESQUIRE</p> <p>4 WILLIAMS MULLEN</p> <p>5 200 South 10th Street</p> <p>6 Suite 1600</p> <p>7 Richmond, Virginia 23219</p> <p>8 P.O. Box 1320</p> <p>9 Richmond, Virginia 23218</p> <p>10 (804) 420-6074</p> <p>11</p> <p>12 ALSO PRESENT: Melissa Wolf Riley</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>   |

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Transcript of Kathleen (Katy) Hoffman, Corporate Representative 2 (5 to 8)

Conducted on September 6, 2024

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| <p style="text-align: right;">5</p> <p style="text-align: center;">C O N T E N T S</p> <p>1 WITNESS PAGE</p> <p>2 KATHLEEN "KATY" HOFFMAN</p> <p>3 By Mr. Diehl 8</p> <p>4 By Ms. McGraw 96</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p style="text-align: center;">E X H I B I T S</p> <p>9 (Attached to the Transcript)</p> <p>10 ON BEHALF OF THE PLAINTIFFS</p> <p>11 NO. DESCRIPTION PAGE</p> <p>12 25 Resume of Katy Hoffman, Esq. 17</p> <p>13 (6 pgs.)</p> <p>14 26 Folder of Documents Brought by 37</p> <p>15 Katy Hoffman</p> <p>16 26-A Handwritten Notes 37</p> <p>17 26-B Defendant UVA's Amended Answer to 38</p> <p>18 Plaintiffs' Interrogatory No. 1</p> <p>19 26-C Vaccine Religious Accommodation 38</p> <p>20 Requests (UVA_0000467 - 494)</p> <p>21 26-D Spreadsheet 39</p> <p>22</p> | <p style="text-align: right;">7</p> <p style="text-align: center;">P R O C E E D I N G S</p> <p>1 (Witness was sworn by the reporter.)</p> <p>2 MS. MCGRAW: Before we get started, I just</p> <p>3 wanted to note for the record that it's our</p> <p>4 understanding that Mr. Diehl is videotaping the</p> <p>5 deposition for his personal use, and not to be made</p> <p>6 public in any way, and we object to the use of the</p> <p>7 video at trial or any proceeding. And we'd also like</p> <p>8 to note that Ms. Hoffman is produced as a</p> <p>9 representative of UVA pursuant to the objections and</p> <p>10 designations that were made by UVA regarding the</p> <p>11 30(b)(6) notice, which were marked as Exhibits 1 and</p> <p>12 2 -- Defense Exhibits 1 and 2 in the deposition of</p> <p>13 Dr. Sifri, and are incorporated here.</p> <p>14 MR. DIEHL: And we understand counsel's</p> <p>15 objections. We don't necessarily agree with all of</p> <p>16 them, but we will soldier on.</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>      |
| <p style="text-align: right;">6</p> <p style="text-align: center;">E X H I B I T S ( C O N T D.)</p> <p>1 ON BEHALF OF DEFENDANT RECTOR AND VISITORS OF THE</p> <p>2 UNIVERSITY OF VIRGINIA</p> <p>3 NO. DESCRIPTION PAGE</p> <p>4 D-3 UVA Health Procedure and Guidance for 98</p> <p>5 Managing and Analyzing Vaccine</p> <p>6 Religious Exemption Requests Under</p> <p>7 Health System Policy OCH-002</p> <p>8 (UVA_0000003 - 0000011)</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>  | <p style="text-align: right;">8</p> <p style="text-align: center;">KATHLEEN "KATY" HOFFMAN,</p> <p>1 having been duly sworn, was examined and testified</p> <p>2 under oath as follows:</p> <p>3 EXAMINATION BY COUNSEL FOR THE PLAINTIFFS</p> <p>4 BY MR. DIEHL:</p> <p>5 Q Ms. Hoffman, thank you for being here</p> <p>6 today. Can you say your full name and spell any more</p> <p>7 complicated parts if possible?</p> <p>8</p> <p>9 A Sure. My legal name is Kathleen Hoffman,</p> <p>10 K-A-T-H-L-E-E-N. I go by Katy, K-A-T-Y.</p> <p>11 Q And I introduced myself beforehand, and I</p> <p>12 apologize for being a moment late here, but my name is</p> <p>13 Sam Diehl. I'm one of the attorneys representing the</p> <p>14 plaintiffs in a lawsuit against the University of</p> <p>15 Virginia. And have you had your deposition taken</p> <p>16 before?</p> <p>17 A I have not.</p> <p>18 Q Am I correct that you have a law degree?</p> <p>19 A I do.</p> <p>20 Q Did you ever practice law?</p> <p>21 A No.</p> <p>22 Q Have you ever attended a deposition,</p> |



Transcript of Kathleen (Katy) Hoffman, Corporate Representative 3 (9 to 12)

Conducted on September 6, 2024

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| <p style="text-align: right;">9</p> <p>1 whether or not you were the witness or taking the</p> <p>2 deposition?</p> <p>3 <b>A No.</b></p> <p>4 Q During law school, did you have a trial</p> <p>5 training course or learn how to take a deposition?</p> <p>6 <b>A Yes.</b></p> <p>7 Q Um, I'm going to tell you some things you</p> <p>8 already know probably, but that's what lawyers do in</p> <p>9 depositions. But it can be helpful to just note that,</p> <p>10 you know, it's somewhat of a normal conversation, but</p> <p>11 obviously we have a court reporter here, and it's a</p> <p>12 little more formal, and so it's obviously helpful if</p> <p>13 you answer audibly and say "yes" or "no" for example,</p> <p>14 rather than "uh-huh" or "uh-uh." Do you understand</p> <p>15 that?</p> <p>16 <b>A Yes.</b></p> <p>17 Q See, you've got it down. But just know</p> <p>18 that if I remind you of that during the day, or I ask</p> <p>19 you to sort of repeat a response audibly, I'm not</p> <p>20 trying to be rude or, you know, denigrate your</p> <p>21 response. It's just I want to get a clear record.</p> <p>22 If you don't understand a question that I</p> | <p style="text-align: right;">11</p> <p>1 but, um, if you need -- if you feel a need for a break</p> <p>2 for any reason, just let me know. We may take -- may</p> <p>3 take a break right then, or we may wait after a couple</p> <p>4 more questions just to wrap up a topic or series of</p> <p>5 questions. But just please let me know if you do need</p> <p>6 to take a break at any point.</p> <p>7 Um, do you understand that this is a</p> <p>8 somewhat unique deposition in that you've been</p> <p>9 designated by the University of Virginia to, uh, to</p> <p>10 testify on behalf of the university as an</p> <p>11 organization? Do you understand that?</p> <p>12 <b>A Yes.</b></p> <p>13 Q So, understand that when I'm asking the</p> <p>14 questions today, I am asking you in your capacity as a</p> <p>15 spokesperson for the university. Do you understand</p> <p>16 that?</p> <p>17 <b>A Yes.</b></p> <p>18 Q And if I ask you a question about yourself</p> <p>19 personally, if it's not obvious from the question,</p> <p>20 I'll try to say "you personally," as opposed to you in</p> <p>21 your capacity as a witness. But if you're uncertain</p> <p>22 about what I'm asking, whether I'm asking about you</p> |
| <p style="text-align: right;">10</p> <p>1 ask, will you tell me?</p> <p>2 <b>A Yes.</b></p> <p>3 Q And if you answer a question, is it fair to</p> <p>4 assume that you understood the question that was</p> <p>5 asked?</p> <p>6 <b>A Yes.</b></p> <p>7 Q Is there any reason that you will have --</p> <p>8 would have difficulty testifying truthfully today?</p> <p>9 <b>A No.</b></p> <p>10 Q You don't have any medical condition or</p> <p>11 memory issues?</p> <p>12 <b>A No.</b></p> <p>13 Q Um, I will try to finish your answer -- or</p> <p>14 let you finish answer. I won't finish your answer. I</p> <p>15 will let you finish your answer. And if you could</p> <p>16 please let me finish my questions. And just know</p> <p>17 sometimes I ask slow questions, because I talk like I</p> <p>18 think. So, just bear with me, and obviously, if I</p> <p>19 start to ask a question and I haven't let you finish,</p> <p>20 will you let me know?</p> <p>21 <b>A Yes.</b></p> <p>22 Q And we'll take breaks throughout the day,</p>   | <p style="text-align: right;">12</p> <p>1 personally or about your testimony as a representative</p> <p>2 spokesperson for the university, will you let me know</p> <p>3 if you're confused about that?</p> <p>4 <b>A Yes.</b></p> <p>5 Q Um, we previously marked -- there's some</p> <p>6 exhibits that have been previously marked in earlier</p> <p>7 depositions, and we may use some of those today, then</p> <p>8 we may mark some new exhibits. Can we give the</p> <p>9 witness -- I'm going to hand you two documents that</p> <p>10 have been previously marked as Defense Exhibits 1 and</p> <p>11 2.</p> <p>12 <b>A Okay.</b></p> <p>13 Q Do you recognize these exhibits?</p> <p>14 <b>A Yes.</b></p> <p>15 Q What -- what are they?</p> <p>16 <b>A Um, as noted, they are the university's</b></p> <p>17 <b>objections and responses to your plaintiffs' notice of</b></p> <p>18 <b>Rule 30(b)(6). And there's an amended notice as well.</b></p> <p>19 MR. DIEHL: And then if we could hand the</p> <p>20 witness -- are these all the exhibits from yesterday?</p> <p>21 THE REPORTER: Uh-huh.</p> <p>22 MR. DIEHL: Thank you.</p>   |



Transcript of Kathleen (Katy) Hoffman, Corporate Representative 4 (13 to 16)

Conducted on September 6, 2024

|   |   |
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| <p>13</p> <p>1 BY MR. DIEHL:</p> <p>2 Q I'm handing you a document that's</p> <p>3 previously marked as Exhibit 20. Do you recognize</p> <p>4 that document?</p> <p>5 A Yes.</p> <p>6 Q And you understand that's, that's the</p> <p>7 notice that is the reason -- is ultimately the reason</p> <p>8 you're here today as spokesperson?</p> <p>9 A Yes.</p> <p>10 Q Whether using that document or any of the</p> <p>11 other, the two exhibits, defense exhibits that are</p> <p>12 marked there, can you explain to me what you've</p> <p>13 been -- what you're prepared to testify about today?</p> <p>14 A Um, yes.</p> <p>15 MS. McGRAW: I'll just note for the witness</p> <p>16 that the designation is on Defense Exhibit 2,</p> <p>17 page two.</p> <p>18 MR. DIEHL: Sure. And that's helpful.</p> <p>19 Thanks.</p> <p>20 (Witness perusing document.)</p> <p>21 MS. McGRAW: Sam, I think we might need the</p> <p>22 question again.</p>               | <p>15</p> <p>1 adverse employment actions or separations from</p> <p>2 employment, that section. Topic 2, as it relates to</p> <p>3 the religious, so request for vaccine exemption</p> <p>4 considered by UVA from January 1st forward. Um --</p> <p>5 Q January 1st of what --</p> <p>6 A 2018 forward.</p> <p>7 MS. McGRAW: And I'll just note we do have</p> <p>8 an objection, and the witness is going to testify</p> <p>9 regarding the COVID vaccine policy in effect during</p> <p>10 the 2021 time period when these plaintiffs were</p> <p>11 employed.</p> <p>12 MR. DIEHL: Well, I guess -- I'm asking</p> <p>13 her -- I don't want you to testify, counsel. This is</p> <p>14 your witness, counsel.</p> <p>15 MS. McGRAW: No, I'm not testifying.</p> <p>16 MR. DIEHL: We've noted your objection. We</p> <p>17 have your objection in the record. I need to hear</p> <p>18 from the witness. So --</p> <p>19 MS. McGRAW: You're welcome to hear from</p> <p>20 the witness, but she's representing --</p> <p>21 MR. DIEHL: That's not a proper objection.</p> <p>22 MS. McGRAW: -- she's representing UVA.</p>   |
| <p>14</p> <p>1 MR. DIEHL: Sure. I thought she was</p> <p>2 looking at that. So --</p> <p>3 THE WITNESS: Oh. Oh, I'm sorry.</p> <p>4 MS. McGRAW: No, it's --</p> <p>5 BY MR. DIEHL:</p> <p>6 Q I was just finding my copy. I've got it</p> <p>7 here.</p> <p>8 A Yeah, I'm sorry.</p> <p>9 Q So maybe looking at -- if you could look at</p> <p>10 exhibit --</p> <p>11 MR. DIEHL: Which exhibit is that one?</p> <p>12 MS. McGRAW: Defense 2.</p> <p>13 BY MR. DIEHL:</p> <p>14 Q Okay. Maybe looking at Defense 2 -- oh, I</p> <p>15 wrote it wrong yesterday. That was the source of my</p> <p>16 confusion. I'm like, That's not Defense 2.</p> <p>17 Looking at Defense Exhibit 2 and</p> <p>18 Exhibit 20, can you explain what you're prepared to</p> <p>19 testify about today?</p> <p>20 A Yes. As noted in Defense Exhibit 2,</p> <p>21 page two, um, I am prepared to discuss, let me see,</p> <p>22 um, topics related to Subject 1(i), which is any</p> | <p>16</p> <p>1 There's a 30(b)(6) objection that's designated her to</p> <p>2 testify about very specific things. She has no</p> <p>3 ability to go beyond that. If she wants to do it in</p> <p>4 her personal capacity, you can notice the deposition.</p> <p>5 But she's here for very specific testimony.</p> <p>6 MR. DIEHL: Okay.</p> <p>7 BY MR. DIEHL:</p> <p>8 Q You can -- you can go ahead.</p> <p>9 A Um, Topic 3, which is related to the</p> <p>10 plaintiffs that we -- that were employed by UVA, the</p> <p>11 named plaintiffs in those -- I mean, do you want me to</p> <p>12 read all of the --</p> <p>13 Q No. No. I guess, you don't have to read</p> <p>14 the actual topics necessarily, but I just wanted to</p> <p>15 confirm the -- yeah, I guess I just wanted to confirm</p> <p>16 what you were prepared to talk about.</p> <p>17 A Yeah. Topic 4 as it relates to religious</p> <p>18 exemptions, and Topic 17 in terms of how I prepared.</p> <p>19 Q Let me -- let me just step back for a</p> <p>20 second and ask you how long have you worked -- well,</p> <p>21 what's your current job?</p> <p>22 A I am the Senior Director of Service for UVA</p> |



Conducted on September 6, 2024

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| <p>17</p> <p>1 <b>Health.</b></p> <p>2 MR. DIEHL: And I'm going to mark an</p> <p>3 exhibit here. Are we on twenty --</p> <p>4 THE REPORTER: Twenty-five.</p> <p>5 (Exhibit 25 was marked for identification</p> <p>6 and attached to the transcript.)</p> <p>7 BY MR. DIEHL:</p> <p>8 Q Do you recognize Exhibit 25?</p> <p>9 A <b>Yes.</b></p> <p>10 Q What is it?</p> <p>11 A <b>It is my CV.</b></p> <p>12 Q Your --</p> <p>13 A <b>From -- it looks like it's from LinkedIn.</b></p> <p>14 Q And I'll just represent to you, I'm not</p> <p>15 trying to be -- I guess I could have just said this at</p> <p>16 the beginning -- but I -- this is the document that's</p> <p>17 ultimately available through LinkedIn. And so I just</p> <p>18 pulled it off that site. Did you create your LinkedIn</p> <p>19 profile?</p> <p>20 A <b>I did.</b></p> <p>21 Q And so, does this list each of your</p> <p>22 positions that you've held, employment positions</p>   | <p>19</p> <p>1 well?</p> <p>2 A <b>I did.</b></p> <p>3 Q Was it like a part-time program?</p> <p>4 A <b>Yes.</b></p> <p>5 Q Hence the four years?</p> <p>6 A <b>Yes.</b></p> <p>7 Q Did you have any, any particular</p> <p>8 concentration? I know law degrees don't -- that's not</p> <p>9 common maybe. But were there any specialization or</p> <p>10 certificates or anything other than a JD?</p> <p>11 A <b>I did not.</b></p> <p>12 Q Did you take courses regarding employment</p> <p>13 laws?</p> <p>14 A <b>Yes.</b></p> <p>15 Q And you -- where were you working at the</p> <p>16 time you obtained your law degree?</p> <p>17 A <b>I was at St. Peter's.</b></p> <p>18 Q What is -- what is St. Peter's?</p> <p>19 A <b>St. Peter's is a health system in upstate</b></p> <p>20 <b>New York.</b></p> <p>21 Q And, uh, what -- what positions did you</p> <p>22 hold for St. Peter's?</p>   |
| <p>18</p> <p>1 you've held since graduating from undergraduate?</p> <p>2 A <b>It does not.</b></p> <p>3 Q Um, what -- what is missing, I guess, I</p> <p>4 don't know that we need to go all the way back, but is</p> <p>5 there anything missing in the last 20 years?</p> <p>6 A <b>No, not in the last 20 years, no.</b></p> <p>7 Q Okay. And it looks like you have a</p> <p>8 Bachelor's Degree from Eckerd College in International</p> <p>9 Business? Is that correct?</p> <p>10 A <b>Correct.</b></p> <p>11 Q And then you -- did you go directly to</p> <p>12 Syracuse to get an MBA at that point, after</p> <p>13 graduation?</p> <p>14 A <b>I -- no. I worked for a year --</b></p> <p>15 Q Okay.</p> <p>16 A <b>-- before I went to graduate school.</b></p> <p>17 Q And then it looks like you went back to law</p> <p>18 school while you were working.</p> <p>19 A <b>Correct.</b></p> <p>20 Q Or were you working -- well, yeah. Sorry</p> <p>21 about that. You worked for a period of time, and then</p> <p>22 did you attend law school while you were working as</p> | <p>20</p> <p>1 A <b>I began as an Employee Relations, Colleague</b></p> <p>2 <b>Relations Specialist. I also worked as the manager of</b></p> <p>3 <b>recruitment and retention. I worked as a Director of</b></p> <p>4 <b>Risk Services, um, Regional Director of College</b></p> <p>5 <b>Relations, and CHRO. Ultimately, regional CHRO.</b></p> <p>6 Q How many employees did St. Peter's have</p> <p>7 while you worked there?</p> <p>8 A <b>Um, originally, around 5,000. It was then</b></p> <p>9 <b>part of a merger situation where three health systems</b></p> <p>10 <b>merged, and so it went to about 12,000 employees.</b></p> <p>11 Q Um, is St. Peter's a Catholic health</p> <p>12 system?</p> <p>13 A <b>It was affiliated with the Catholic Church,</b></p> <p>14 <b>yes.</b></p> <p>15 Q What does "affiliated" mean I guess? Can</p> <p>16 you explain what the relationship was with the</p> <p>17 Catholic Church?</p> <p>18 A <b>Yeah. I mean, it was a Catholic</b></p> <p>19 <b>institution.</b></p> <p>20 Q Did it operate in any way -- well, I guess,</p> <p>21 did the fact that it was a Catholic institution impact</p> <p>22 operations or your work in any way?</p> |



Transcript of Kathleen (Katy) Hoffman, Corporate Representative 6 (21 to 24)

Conducted on September 6, 2024

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| <p style="text-align: right;">21</p> <p>1 A It -- it -- the system followed the</p> <p>2 religious and ethical directives of the Catholic</p> <p>3 Church, so there was an impact on some of our</p> <p>4 operations. Um, you know, for example, the system did</p> <p>5 not perform abortions or, um -- I'm trying to think of</p> <p>6 what else. That's off the top of my head, or, you</p> <p>7 know, sterilizations or things like that, unless they</p> <p>8 were medically necessary. But -- if that helps.</p> <p>9 Q Are you Catholic personally?</p> <p>10 A Yes.</p> <p>11 Q Do you consider yourself a practicing</p> <p>12 Catholic? To the extent that means something? I</p> <p>13 mean, I guess, to the extent that term means</p> <p>14 something.</p> <p>15 A I -- I go to church, if that's what you're</p> <p>16 asking, yes.</p> <p>17 Q Do you attend Mass on a weekly basis?</p> <p>18 A I try to, yes.</p> <p>19 Q More than a weekly basis?</p> <p>20 A No, not more than a weekly basis, but I try</p> <p>21 to weekly.</p> <p>22 Q Did you -- did you leave St. Peter's for a</p>                      | <p style="text-align: right;">23</p> <p>1 A Um, it was -- it was something that popped</p> <p>2 up, I think, on my LinkedIn actually. And my husband</p> <p>3 and I had intended on relocating to a warmer climate</p> <p>4 at some point in the future. So, I explored the</p> <p>5 opportunity, and we liked the area, so we ended up</p> <p>6 moving probably a little bit earlier than we planned,</p> <p>7 I would say, a couple of years ahead of schedule. But</p> <p>8 that's how I ended up here.</p> <p>9 Q Did you regret that once you hit that</p> <p>10 97 degrees and a hundred percent humidity two weeks</p> <p>11 ago? You don't have to answer that. I was here for</p> <p>12 that, and I did not enjoy it.</p> <p>13 Do you know why UVA was looking for a</p> <p>14 Senior Direct -- I'm sorry. What's your --</p> <p>15 A Senior Director of Service.</p> <p>16 Q What's your title again?</p> <p>17 A Senior Director. Sorry.</p> <p>18 Q Senior Director, and Senior Director of</p> <p>19 Services?</p> <p>20 A Of Service.</p> <p>21 Q Service.</p> <p>22 A Yes.</p> |
| <p style="text-align: right;">22</p> <p>1 period of time and then come back to St. Peter's to</p> <p>2 work?</p> <p>3 A Yes.</p> <p>4 Q What is Northern Rivers Family of Services?</p> <p>5 A It is a nonprofit organization that</p> <p>6 provides services to, um, children and families in the</p> <p>7 Capital Region of New York. Primarily behavioral</p> <p>8 health.</p> <p>9 Q And why did you go back to St. Peter's?</p> <p>10 A I received a phone call from my prior boss</p> <p>11 in HR there, who was the VP of HR, that they were</p> <p>12 looking for someone to be responsible for Colleague</p> <p>13 Relations, Employee Relations, which was my first</p> <p>14 love. And it was -- it was going to end up being a</p> <p>15 regional role, so it would be a big scope. And, um,</p> <p>16 so I went in and talked with them, and ultimately I</p> <p>17 went back.</p> <p>18 Q And how did you get to UVA?</p> <p>19 A My husband and I relocated for a position</p> <p>20 that I took with UVA.</p> <p>21 Q Were you -- were you looking for a new</p> <p>22 position, or did a recruiter find you?</p> | <p style="text-align: right;">24</p> <p>1 Q What does that mean, I guess, as opposed to</p> <p>2 some other senior director?</p> <p>3 A So the HR function at UVA is divided into</p> <p>4 different segments, dependent on the function of the</p> <p>5 role. And so, the group that I lead is our HR</p> <p>6 business partner group, and our segment is service.</p> <p>7 So that's why that's my title.</p> <p>8 Q And what other functions are there that</p> <p>9 are -- in addition to service?</p> <p>10 A So there's Impact. Um, oh, you're going to</p> <p>11 quiz me. I honestly don't remember them all. I know</p> <p>12 there's Impact. I know there's Service. I can't</p> <p>13 remember.</p> <p>14 Q Impact sounds a lot cooler, I'm not going</p> <p>15 to lie.</p> <p>16 A Yeah.</p> <p>17 Q Do you know what Impact does, or what their</p> <p>18 function is?</p> <p>19 A I think that's like the total rewards</p> <p>20 group, so benefits, comp. I'm trying to think what</p> <p>21 else is in that.</p> <p>22 Q Recruiting? Is Recruiting in that group?</p>          |



Transcript of Kathleen (Katy) Hoffman, Corporate Representative 7 (25 to 28)

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| <p style="text-align: right;">25</p> <p>1 <b>A Recruiting is in a different group. I</b><br/> 2 <b>think re -- I don't want to spec -- I don't know off</b><br/> 3 <b>the top of my head. I probably should know honestly,</b><br/> 4 <b>but I don't.</b><br/> 5 Q And did Melissa Frederick hold the same<br/> 6 role as you before she left UVA?<br/> 7 <b>A Melissa Frederick actually, from my</b><br/> 8 <b>understanding, held the position that was a</b><br/> 9 <b>combination of my role and my direct supervisor's</b><br/> 10 <b>role, Karmen Fittes, who's the CHRO for the health</b><br/> 11 <b>system.</b><br/> 12 Q So to your knowledge, was Ms. Frederick<br/> 13 CHRO, or did she hold that -- did she hold the title,<br/> 14 or did she hold the function -- did she perform the<br/> 15 function?<br/> 16 <b>A She performed the function, yeah.</b><br/> 17 Q Do you know why Melissa Frederick is no<br/> 18 longer with University of Virginia?<br/> 19 MS. McGRAW: Objection, calls for<br/> 20 speculation. Beyond the scope. You can answer.<br/> 21 <b>A I know she took another job. That's all I</b><br/> 22 <b>know.</b></p> | <p style="text-align: right;">27</p> <p>1 that -- was any of that part of your job when you were<br/> 2 hired, when you first started?<br/> 3 <b>A No.</b><br/> 4 Q Did any, any work related to those issues,<br/> 5 the issues that you're going to discuss today, was any<br/> 6 of the work related to the issues that we're going to<br/> 7 discuss today part of your job when you first started<br/> 8 at UVA?<br/> 9 <b>A Not to my -- not that I recall, no.</b><br/> 10 Q Were you a part of the process through<br/> 11 which UVA changed policy OCH-002 -- well, no,<br/> 12 actually. Strike that.<br/> 13 I understand there was a change in the<br/> 14 religious exemption process in the fall of 2022. Are<br/> 15 you aware of that?<br/> 16 <b>A Yes.</b><br/> 17 Q Were you a part of the process of changing<br/> 18 the religious exemption process at, at that time?<br/> 19 <b>A Yes.</b><br/> 20 Q How did that -- how did that process of<br/> 21 changing the religious exemption process, how did that<br/> 22 come about?</p>   |
| <p style="text-align: right;">26</p> <p>1 <b>BY MR. DIEHL:</b><br/> 2 Q When you were hired, were you hired for --<br/> 3 well, let me ask a better question. Let me start that<br/> 4 over.<br/> 5 There's the issues that we're going to talk<br/> 6 about today, some of which fell within your job<br/> 7 functions when you, when you started work at UVA; is<br/> 8 that fair?<br/> 9 MS. McGRAW: Objection, vague and<br/> 10 ambiguous.<br/> 11 <b>BY MR. DIEHL:</b><br/> 12 Q Well, let me ask you this: So for example,<br/> 13 there were some offers that were labeled offers of<br/> 14 reinstatement that were made to some of the plaintiffs<br/> 15 in this lawsuit. Are you familiar with that?<br/> 16 <b>A Yes.</b><br/> 17 Q And you were the contact person, or you<br/> 18 were involved in that process; is that fair?<br/> 19 <b>A Yes. Yes.</b><br/> 20 Q Um, was any of that work, you know,<br/> 21 anything related to religious exemptions, or the<br/> 22 religious exemption process, or this lawsuit, was</p>  | <p style="text-align: right;">28</p> <p>1 MS. McGRAW: I'm going to object. This is<br/> 2 beyond the scope and contrary to the objections that<br/> 3 we made to the notice. She's not designated to<br/> 4 testify about the 2022 procedure. She's designated to<br/> 5 testify about some very specific topics related to the<br/> 6 2021 review process.<br/> 7 <b>MR. DIEHL:</b> Well, maybe I'll lay some<br/> 8 foundation.<br/> 9 <b>MS. McGRAW:</b> You can lay all the foundation<br/> 10 you want. The objection is beyond the --<br/> 11 <b>MR. DIEHL:</b> So your stance is that the 2022<br/> 12 process, including the process in which a number of<br/> 13 the plaintiffs in this lawsuit were rehired and<br/> 14 granted religious exemptions, that process is<br/> 15 irrelevant to this suit. That's your position?<br/> 16 <b>MS. McGRAW:</b> My position is she's<br/> 17 designated on very specific topics. If you can point<br/> 18 to me where we've agreed to present her on those<br/> 19 topics, we can discuss it.<br/> 20 <b>MR. DIEHL:</b> I -- I noticed those topics.<br/> 21 We noticed those topics, and --<br/> 22 <b>MS. McGRAW:</b> Where does it say anything</p> |



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| <p style="text-align: right;">29</p> <p>1 about reinstatement?</p> <p>2 MR. DIEHL: It doesn't say anything about</p> <p>3 reinstatement. It talks about the religious exemption</p> <p>4 process to the present.</p> <p>5 MS. McGRAW: And as you know, we objected</p> <p>6 and made clear that we --</p> <p>7 MR. DIEHL: And we didn't agree to those</p> <p>8 objections. We didn't concede that that was correct.</p> <p>9 Maybe we have to move to compel if you're going to</p> <p>10 instruct her not to answer on those topics, but I --</p> <p>11 MS. McGRAW: I'm telling you that she's</p> <p>12 designated as a representative only on certain topics.</p> <p>13 I haven't instructed her not to answer anything in her</p> <p>14 personal capacity.</p> <p>15 MR. DIEHL: Well, I'm not deposing her in</p> <p>16 her personal capacity, and we reserve the right to</p> <p>17 bring her back. But if she's --</p> <p>18 MS. McGRAW: She's not prepared to testify</p> <p>19 on the 2022 procedure. We made very clear objections</p> <p>20 to that.</p> <p>21 MR. DIEHL: And your objections were that</p> <p>22 that's irrelevant to this lawsuit.</p> | <p style="text-align: right;">31</p> <p>1 part of the process by which Plaintiffs in this</p> <p>2 lawsuit were offered reinstatement, the -- their</p> <p>3 religious accommodations were granted pursuant to the</p> <p>4 new 2022 religious accommodation process; is that</p> <p>5 correct?</p> <p>6 MS. McGRAW: Same objection.</p> <p>7 "Reinstatement" is not a subject matter in the topics</p> <p>8 in any way. You can answer.</p> <p>9 A Okay. Um, yes.</p> <p>10 BY MR. DIEHL:</p> <p>11 Q And just so it's clear, UVA's lawyer has</p> <p>12 to -- well, you may believe she has to make some</p> <p>13 objections at some point during the lawsuit, or during</p> <p>14 the deposition today, but if she doesn't instruct you</p> <p>15 not to answer, do you understand that you can answer</p> <p>16 the question if you understood it?</p> <p>17 A Yes.</p> <p>18 Q And you understand that as someone with a</p> <p>19 law degree, that lawyer objections aren't intended to</p> <p>20 shade the witness's testimony, or influence the</p> <p>21 witness's testimony, correct?</p> <p>22 A Yes.</p>   |
| <p style="text-align: right;">30</p> <p>1 MS. McGRAW: Our objections were that she's</p> <p>2 not going to be testifying about that, because it's</p> <p>3 not an issue in this lawsuit.</p> <p>4 MR. DIEHL: It's not an issue in that</p> <p>5 lawsuit. It's not relevant to this lawsuit, that</p> <p>6 process. That's your position.</p> <p>7 MS. McGRAW: My position is that it's not</p> <p>8 relevant to -- no, it's not.</p> <p>9 MR. DIEHL: It's not. Okay. We'll just --</p> <p>10 MS. McGRAW: I mean, you have -- let me</p> <p>11 make clear, you have detailed objections that include</p> <p>12 relevance. I can't remember off the top of my head</p> <p>13 what else in this there. I'm happy to revisit that</p> <p>14 and --</p> <p>15 MR. DIEHL: I'm not going to say you've</p> <p>16 waived anything by, you know, not reciting it. Thank</p> <p>17 you for that. I'm not taking that position, but --</p> <p>18 I'm just going to keep going.</p> <p>19 BY MR. DIEHL:</p> <p>20 Q So, uh -- I don't remember where I was,</p> <p>21 I'll think about it.</p> <p>22 Just as a, to continue that thought, as</p>                                | <p style="text-align: right;">32</p> <p>1 Q Was the process in -- let me start that</p> <p>2 over.</p> <p>3 The religious exemption process in, that</p> <p>4 was revised in 2022, that ultimately was different</p> <p>5 than the process that was applied to religious</p> <p>6 exemption requests in 2021, correct?</p> <p>7 A I don't know that I would characterize it</p> <p>8 that way.</p> <p>9 Q It was not different?</p> <p>10 A I mean, it, it wasn't -- it -- we used the</p> <p>11 same criteria to evaluate. Is that what you're</p> <p>12 getting at? We used the same criteria that we used in</p> <p>13 '21 to evaluate. It was -- it was a different time.</p> <p>14 We knew more about the virus. We knew more about</p> <p>15 vaccination, the -- you know. So I don't know that</p> <p>16 the process was different. I don't know that I would</p> <p>17 characterize it that way.</p> <p>18 Q So -- okay. So, was there any differences</p> <p>19 between the process in 2022 and the process in 2021?</p> <p>20 And I'm talking about -- when I say the twenty</p> <p>21 twenty -- just for shorthand, is it fair if I say the</p> <p>22 2022 process? And I recognize it was at the end of</p> |



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| <p>33</p> <p>1 the year, but is -- do you understand what I'm saying</p> <p>2 when I talk about the 2022 process?</p> <p>3 <b>A Yes.</b></p> <p>4 Q And if I talk about the 2021 process, I'm</p> <p>5 talking about the process that was applied to</p> <p>6 religious exemptions in the -- from July 2021 through</p> <p>7 the end of 2021. Do you understand that?</p> <p>8 <b>A Yes.</b></p> <p>9 Q So if I say 2021 process or 2022 process,</p> <p>10 those make sense to you?</p> <p>11 <b>A Yes.</b></p> <p>12 Q So your testimony is that there was --</p> <p>13 there were not any significant differences between the</p> <p>14 2022 process and the 2021 process for religious</p> <p>15 exemptions?</p> <p>16 MS. McGRAW: Objection to the form,</p> <p>17 mischaracterizes.</p> <p>18 BY MR. DIEHL:</p> <p>19 Q Well, I'm trying to understand.</p> <p>20 <b>A Can I ask you when you say "process," what</b></p> <p>21 <b>you're referring to?</b></p> <p>22 Q We'll break it down then. So, there was --</p>  | <p>35</p> <p>1 process, procedure or substance?</p> <p>2 <b>A We -- we -- both processes utilized the</b></p> <p>3 <b>criteria in review that included, Was there a</b></p> <p>4 <b>sincerely held religious belief, was that belief in</b></p> <p>5 <b>conflict with the vaccination requirement, and looked</b></p> <p>6 <b>at undue hardship. So I think that's the same.</b></p> <p>7 Q So, yeah. So to be clear, --</p> <p>8 <b>A Yes.</b></p> <p>9 Q -- I wasn't asking about similarities.</p> <p>10 <b>A Okay.</b></p> <p>11 Q I'm asking about differences.</p> <p>12 <b>A Yes. I'm talking it through.</b></p> <p>13 Q What other differences can you think of, if</p> <p>14 any?</p> <p>15 <b>A Um, I'm not sure that I can think of any</b></p> <p>16 <b>other differences.</b></p> <p>17 Q Uh, it's my understanding that -- do you</p> <p>18 know what I refer to when I say the CMS mandate?</p> <p>19 <b>A Yes.</b></p> <p>20 Q And that was a rule that the Center for --</p> <p>21 is it Center for Medicare and Medicaid Services? Is</p> <p>22 that the right term?</p>  |
| <p>34</p> <p>1 there was a process and procedure for reviewing</p> <p>2 religious exemptions in 2021, correct?</p> <p>3 <b>A Yes.</b></p> <p>4 Q And that process had both process</p> <p>5 components, and it had substantive components. Is</p> <p>6 that fair?</p> <p>7 <b>A Yes.</b></p> <p>8 Q So there were criteria that were applied,</p> <p>9 and then there were steps in the process, correct?</p> <p>10 <b>A Correct.</b></p> <p>11 Q And of either the criteria or substance of</p> <p>12 the process in 2021, or the procedural aspects of the</p> <p>13 process in 2021, were there differences under the 2022</p> <p>14 religious exemption review process?</p> <p>15 <b>A Yes.</b></p> <p>16 Q What were those?</p> <p>17 <b>A The 2021 process involved a committee that</b></p> <p>18 <b>reviewed the exemption requests. The 2022 process, it</b></p> <p>19 <b>was one person reviewing the requests.</b></p> <p>20 Q And that one person was you?</p> <p>21 <b>A That one person was me.</b></p> <p>22 Q Any other differences, either process or --</p> | <p>36</p> <p>1 <b>A Yes.</b></p> <p>2 Q So CMS promulgated a rule, and that rule</p> <p>3 included mandates related to COVID vaccination for UVA</p> <p>4 health workers. Is that a fair characterization?</p> <p>5 <b>A Yes.</b></p> <p>6 Q And that -- it's my understanding that rule</p> <p>7 was in effect in 2021, or for some period of time in</p> <p>8 2021, and continuing into sometime in 2023. Is that</p> <p>9 your understanding?</p> <p>10 <b>A Yes.</b></p> <p>11 Q Did that rule have any effect or impact on</p> <p>12 UVA's religious accommodation review process during</p> <p>13 the period -- well, during the period that the CMS</p> <p>14 mandate was in effect?</p> <p>15 <b>A No.</b></p> <p>16 Q To your knowledge -- to your knowledge, did</p> <p>17 UVA comply with the requirements of the CMS mandate?</p> <p>18 <b>A Yes, to my knowledge.</b></p> <p>19 Q Uh, you brought some documents here today</p> <p>20 in a folder, and if you could -- sorry. I don't mean</p> <p>21 to -- if you could set the previous exhibits aside.</p> <p>22 Sometimes it gets a little busy over there. And then</p> |



Transcript of Kathleen (Katy) Hoffman, Corporate Representative 10 (37 to 40)

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| <p style="text-align: right;">37</p> <p>1 we'll just mark that folder, if that's all right, as</p> <p>2 Exhibit 26. Is that our next exhibit?</p> <p>3 (Exhibit 26 was marked for identification</p> <p>4 and attached to the transcript.)</p> <p>5 BY MR. DIEHL:</p> <p>6 Q And can you just walk me through the</p> <p>7 contents of Exhibit 26, that folder?</p> <p>8 A Sure.</p> <p>9 Q And as we do, I'm going to -- I'm going to</p> <p>10 try to -- I don't know how to do this exactly, but I</p> <p>11 think I'm going to mark the documents inside as</p> <p>12 lettered exhibits. So that will be, you know, 26-A</p> <p>13 through whatever. But just go in whatever order</p> <p>14 your -- you have them there.</p> <p>15 A Okay. The first document is a handwritten</p> <p>16 note that I wrote indicating the number of religious</p> <p>17 exemptions that were reviewed and the outcome of those</p> <p>18 reviews in 2021.</p> <p>19 MR. DIEHL: Okay. And so we'll mark that</p> <p>20 as 26-A.</p> <p>21 (Exhibit 26-A was marked for identification</p> <p>22 an attached to the transcript.)</p> | <p style="text-align: right;">39</p> <p>1 the last document looks like a printout of a</p> <p>2 spreadsheet?</p> <p>3 A Right. Correct.</p> <p>4 Q And that we'll mark that as 26-D.</p> <p>5 (Exhibit 26-D was marked for identification</p> <p>6 and attached to the transcript.)</p> <p>7 BY MR. DIEHL:</p> <p>8 Q Um, and I'll just note, I believe that we</p> <p>9 previously marked 26-B and 26-C already as exhibits,</p> <p>10 but we'll just keep these marked as they are. But,</p> <p>11 can you -- sorry, I didn't mean to interrupt. Did</p> <p>12 you -- you've mentioned that the, the note page is a,</p> <p>13 a summary you created. Is that correct?</p> <p>14 A Yes.</p> <p>15 Q And then if -- and then just -- we know</p> <p>16 what the interrogatory answer is and the PowerPoint.</p> <p>17 What is the spreadsheet, 26-D?</p> <p>18 A 26-D is a spreadsheet that indicates a few</p> <p>19 things. It is a list of the plaintiffs that I am</p> <p>20 prepared to speak to, the position that they were in,</p> <p>21 and their department, as well as the pay rate that</p> <p>22 they were at when they termed employment in 2021. Or</p> |
| <p style="text-align: right;">38</p> <p>1 BY MR. DIEHL:</p> <p>2 Q And can you just -- while we're -- while</p> <p>3 we're doing that, can you just tell me what the number</p> <p>4 is so that -- I don't want to make her sort of have to</p> <p>5 write the exhibit stickers while she's taking this</p> <p>6 down. So if you can give us the number, then we'll</p> <p>7 know how many letters to create stickers for.</p> <p>8 A So there's three more.</p> <p>9 Q So yes, we'll do 26-A, B, C, D.</p> <p>10 And the next one is the Amended Answer to</p> <p>11 Plaintiffs' Interrogatory 1?</p> <p>12 A Correct.</p> <p>13 (Exhibit 26-B was marked for identification</p> <p>14 and attached to the transcript.)</p> <p>15 BY MR. DIEHL:</p> <p>16 Q So the Amended Answer to Interrogatory 1</p> <p>17 we're marking as 26-B. And what is next?</p> <p>18 A The next is the training document.</p> <p>19 (Exhibit 26-C was marked for identification</p> <p>20 and attached to the transcript.)</p> <p>21 BY MR. DIEHL:</p> <p>22 Q And we've marked that as 26-C. And then</p>                                | <p style="text-align: right;">40</p> <p>1 2022. The next column is the offer that was made for</p> <p>2 reinstatement and the pay rate that they were offered</p> <p>3 at that time. And then the next series of columns are</p> <p>4 any market-related adjustments or merit increases that</p> <p>5 occurred from the time of reinstatement to the present</p> <p>6 and the effective date. The last column, which looks</p> <p>7 like it got a little cut off, is noting that two of</p> <p>8 the plaintiffs' pay rates are at the maximum of the</p> <p>9 pay range.</p> <p>10 Q What are you -- where -- is that the --</p> <p>11 A It says "range" next to it.</p> <p>12 Q Okay. I was going to ask that. Where it</p> <p>13 says "no," and then down below that it should say</p> <p>14 "range."</p> <p>15 A Range, right.</p> <p>16 Q And that is for Ryan Meszaros, and Janet</p> <p>17 Ripley?</p> <p>18 A Correct.</p> <p>19 Q Where did this information come from on</p> <p>20 26-D?</p> <p>21 A It came from our, um, HRIS system, Workday.</p> <p>22 Q Does -- does Workday -- so, did this come</p>   |



Transcript of Kathleen (Katy) Hoffman, Corporate Representative 11 (41 to 44)

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| <p style="text-align: right;">41</p> <p>1 directly from Workday, or did the information come<br/> 2 from Workday, and then the labels were added by<br/> 3 somebody on a spreadsheet? Or anything else -- was<br/> 4 anything added other than information that came<br/> 5 directly from Workday?<br/> 6 <b>A The information came from Workday, but I</b><br/> 7 <b>put it in this format.</b><br/> 8 Q So, for example, where it says<br/> 9 reinstatement offer, 2/23, do you see that label?<br/> 10 <b>A Yes.</b><br/> 11 Q Is that a label that's in Workday?<br/> 12 <b>A No.</b><br/> 13 Q And how -- does Workday store job offers,<br/> 14 or information related to job offers?<br/> 15 <b>A It does. But these, um, reinstatement</b><br/> 16 <b>offers were done outside of Workday, so that column is</b><br/> 17 <b>something that I added.</b><br/> 18 Q The information regarding increases after<br/> 19 February 2023, where did that information come from?<br/> 20 <b>A The -- the increase information came from</b><br/> 21 <b>two places: One, Workday. Two, our compensation</b><br/> 22 <b>department, who provided me with the, uh, budgeted and</b></p>   | <p style="text-align: right;">43</p> <p><b>1 individuals who greet patients in a clinic and ensure</b><br/> <b>2 that their insurance and whatnot, information, is</b><br/> <b>3 up-to-date in the employee health record -- or in the</b><br/> <b>4 patient record.</b><br/> 5 Q So friendly refers to the, kind of the<br/> 6 duties, the making sure there's a friendly access?<br/> 7 <b>A Right, yeah.</b><br/> 8 Q How nice. I was just -- it's interesting.<br/> 9 So, but if we're looking, kind of going<br/> 10 down the line, the -- the -- so, well, I guess for<br/> 11 each of the individuals listed here under Name, the<br/> 12 Job Profile, what job profile is listed here?<br/> 13 <b>A I'm not sure I know what you mean.</b><br/> 14 Q Well, so -- well, but -- the reinstatement<br/> 15 offer refers to the offers of reinstatement, or<br/> 16 so-called. I'm not going to say that they're out<br/> 17 there, but we take the position that they weren't<br/> 18 actually offers of reinstatement. But I'm just going<br/> 19 to call them offers of reinstatement, because I don't<br/> 20 want to have to say that every time, because that's<br/> 21 clunky. So thanks for your patience with that.<br/> 22 Was Mark Ehrlich offered the job in</p> |
| <p style="text-align: right;">42</p> <p><b>1 actual merit pay increases for the medical center and</b><br/> <b>2 the facilities group.</b><br/> 3 Q How was that information stored, to your<br/> 4 knowledge? In terms of, I guess, is there information<br/> 5 by job or by area, or clinic? How is that information<br/> 6 stored in the -- by the compensation group?<br/> 7 <b>A I -- I'm not sure where they store it. I</b><br/> 8 <b>don't -- that, I don't know.</b><br/> 9 Q So, I guess, how do you know -- how did you<br/> 10 know to put, you know, for the -- the line looking at<br/> 11 Mark Ehrlich, it looks like the manager, is that<br/> 12 Patient Friendly Access? I don't know. What is -- do<br/> 13 you know what his title, what it was, or what that<br/> 14 shorthand refers to there in the second column? Or<br/> 15 it's the third column I believe.<br/> 16 <b>A That -- that was his job profile, Manager</b><br/> 17 <b>Patient Friendly Access.</b><br/> 18 Q And what is that -- do you know what that<br/> 19 means? Does it refer to manager of a clinic, or what<br/> 20 is friendly access?<br/> 21 <b>A That refers to a manager who supervises the</b><br/> 22 <b>team that is in the access area. Those are the</b></p> | <p style="text-align: right;">44</p> <p>1 February of 2023 of the Manager Patient Friendly<br/> 2 Access?<br/> 3 <b>A I'm not -- I don't recollect the exact</b><br/> <b>4 title. I -- I believe that the terminology is</b><br/> <b>5 different now. I don't think they use the title -- I</b><br/> <b>6 don't think they use Patient Friendly Access anymore.</b><br/> 7 <b>But I'm -- I don't remember exactly the title that he</b><br/> 8 <b>was offered. Honestly, I don't.</b><br/> 9 Q So, when we are looking across this line, I<br/> 10 mean, it would appear from the way this is set up that<br/> 11 the job profile in this third column would then relate<br/> 12 to the reinstatement offer and then the increase<br/> 13 information following. Is that the way this is<br/> 14 intended to be set up?<br/> 15 <b>A Yes.</b><br/> 16 Q But do you know if the increases that we're<br/> 17 looking at on the right side of this chart after the<br/> 18 thick line, do you know if those increases actually<br/> 19 relate to that exact job profile, Manager Patient<br/> 20 Friendly Access POD?<br/> 21 <b>A They do.</b><br/> 22 Q And, I guess, the same question with</p>   |



Transcript of Kathleen (Katy) Hoffman, Corporate Representative 12 (45 to 48)

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| <p style="text-align: right;">45</p> <p>1 respect to each of the different individual job</p> <p>2 profiles listed. Do the increases shown on the right</p> <p>3 side of this document, um, correspond to the same job</p> <p>4 title as -- or job profile that is listed in the third</p> <p>5 column?</p> <p>6 <b>A Yes.</b></p> <p>7 Q Uh, how was the amount, or any -- how was</p> <p>8 any difference determined between the base rate at</p> <p>9 term and the reinstatement offer rate listed?</p> <p>10 <b>A The difference was determined based on</b></p> <p>11 <b>really whether -- where someone would be if they</b></p> <p>12 <b>hadn't left the position. So taking into</b></p> <p>13 <b>consideration any merit-related increases, and/or any</b></p> <p>14 <b>market adjustments that had been made to that job</b></p> <p>15 <b>profile between the time that the person termed and</b></p> <p>16 <b>the reinstatement offer.</b></p> <p>17 Q And, um, with respect to Joshua Seiler,</p> <p>18 it's my understanding that, that he made believe that</p> <p>19 he would have received a promotion, or would have been</p> <p>20 eligible to be a supervisor based on experience or</p> <p>21 tenure or similar factors. Did UVA consider that in</p> <p>22 coming up with the reinstatement offer numbers or</p> | <p style="text-align: right;">47</p> <p>1 <b>A Anything that happened after they termed.</b></p> <p>2 Q Okay. So it's just sort of the, the time</p> <p>3 period when they were not there before any offer was</p> <p>4 made to hire them again?</p> <p>5 <b>A Yes.</b></p> <p>6 Q And with respect to Ms. Loflin, was --</p> <p>7 Rebecca Loflin there on the second line, do you see</p> <p>8 that?</p> <p>9 <b>A Yes.</b></p> <p>10 Q And it says job profile, RN Care</p> <p>11 Coordinator, is it Clinic II?</p> <p>12 <b>A Clinician II.</b></p> <p>13 Q Clinician II.</p> <p>14 <b>A Yeah.</b></p> <p>15 Q Okay. Was she offered the same job -- and</p> <p>16 sorry. Let me step back for one second. This Cost</p> <p>17 Center column, what does -- what does that refer to?</p> <p>18 <b>A That is the department that the individual</b></p> <p>19 <b>worked in at the time they terminated employment.</b></p> <p>20 Q And so, so just to understand, you know,</p> <p>21 the way this would work, Rebecca Loflin was, her job</p> <p>22 was an RN Care Coordinator Clinician II, working in</p> |
| <p style="text-align: right;">46</p> <p>1 increases shown on this document?</p> <p>2 <b>A No.</b></p> <p>3 Q Do you know whether Mr. Seiler would have</p> <p>4 been eligible or would have become a supervisor if he</p> <p>5 had remained employed by UVA between 2021 and 2023?</p> <p>6 MS. McGRAW: Objection, calls for</p> <p>7 speculation.</p> <p>8 <b>A I have no idea.</b></p> <p>9 <b>BY MR. DIEHL:</b></p> <p>10 Q And you understand that when I say, "Do you</p> <p>11 know?", I'm asking if you know, right?</p> <p>12 <b>A Yes.</b></p> <p>13 Q So I'm not asking you to speculate. I'm</p> <p>14 asking if you know. I just want to be clear, because</p> <p>15 we get that objection, and it doesn't make sense.</p> <p>16 With respect to the reinstatement offers</p> <p>17 that are referenced in the, the column there after the</p> <p>18 thick dark line -- well, actually, where did the thick</p> <p>19 dark line come from?</p> <p>20 <b>A I added it.</b></p> <p>21 Q What does it represent, or what's it there</p> <p>22 for?</p>   | <p style="text-align: right;">48</p> <p>1 the Children's Ambulatory -- what does ops mean?</p> <p>2 <b>A Operations.</b></p> <p>3 Q Operations? That that's the area where she</p> <p>4 worked?</p> <p>5 <b>A Correct.</b></p> <p>6 Q Is that sort of a functional area, or is it</p> <p>7 a clinic? How -- how was those divided, the cost</p> <p>8 centers?</p> <p>9 MS. McGRAW: Object to the form.</p> <p>10 BY MR. DIEHL:</p> <p>11 Q Well, I guess I don't understand. What's a</p> <p>12 cost center?</p> <p>13 <b>A It's a department.</b></p> <p>14 Q Okay. And so is there a difference</p> <p>15 between -- so for Mark Ehrlich, for example,</p> <p>16 there's -- I can't -- endoscopy, endoscopy -- where is</p> <p>17 the emphasis?</p> <p>18 <b>A Endoscopy.</b></p> <p>19 Q There you go. I knew I was wrong. Is</p> <p>20 there -- is there a clinic? Does that refer to a</p> <p>21 specific clinic within a department, or I guess --</p> <p>22 <b>A Yes. Yeah, that -- Endoscopy is a</b></p>   |



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| <p style="text-align: right;">49</p> <p>1 department.</p> <p>2 Q And then the Children's Ambulatory</p> <p>3 Operations, is that a clinic as well?</p> <p>4 A That is more of an administrative group</p> <p>5 that supports a number of areas in Children's</p> <p>6 Hospital, yeah.</p> <p>7 Q Do you know what, what clinic or specific</p> <p>8 area Rebecca Loflin worked in?</p> <p>9 A Off the top of my head, I do not.</p> <p>10 Q Do you -- I -- I don't either, but I</p> <p>11 understand it was something working with children with</p> <p>12 diabetes? Is that -- do you have that understanding</p> <p>13 as well?</p> <p>14 A That sounds familiar, yes. I didn't -- I</p> <p>15 didn't really prepare to talk about this, so I</p> <p>16 apologize. I don't know off the top of my head.</p> <p>17 Q Well, I'm trying to understand what these</p> <p>18 numbers mean.</p> <p>19 A Uh-huh.</p> <p>20 Q And so, for example, with respect to</p> <p>21 Rebecca Loflin, if you look here, you know, you've got</p> <p>22 a base rate at term of 73,684 and change, and then the</p>  | <p style="text-align: right;">51</p> <p>1 A I am not, no.</p> <p>2 Q And so how did you learn about that issue</p> <p>3 related to the patient population that you referred</p> <p>4 to?</p> <p>5 MS. McGRAW: I'm going to object that we've</p> <p>6 gone way beyond the scope at this point. But go ahead</p> <p>7 and answer if you know.</p> <p>8 A We -- when we determined to make</p> <p>9 reinstatement offers, we looked at a couple of things.</p> <p>10 One, where did we have openings? Because we were not</p> <p>11 creating positions where positions did not exist. And</p> <p>12 two, was there any risk to having someone who was</p> <p>13 unvaccinated in that area?</p> <p>14 BY MR. DIEHL:</p> <p>15 Q Who is "we"?</p> <p>16 A That was -- the opening determination was,</p> <p>17 was myself and some of my HR colleagues looking at job</p> <p>18 openings. And the undue hardship discussion was with</p> <p>19 our epidemiologist.</p> <p>20 Q Is that Costi Sifri, Sifri?</p> <p>21 A Correct.</p> <p>22 Q So, um, are the -- are there any others on</p>   |
| <p style="text-align: right;">50</p> <p>1 reinstatement offer number says 78,498 and change; is</p> <p>2 that right?</p> <p>3 A Yes.</p> <p>4 Q But, what, was the offer -- I mean, it</p> <p>5 looks like, from this chart, that the offer was for</p> <p>6 job profile RN Care Coordinator Clinician II in the</p> <p>7 Children's Ambulatory Operations. Was that -- was</p> <p>8 that the reinstatement offer to your knowledge?</p> <p>9 A No.</p> <p>10 Q Do you know what the reinstatement offer</p> <p>11 was that this refers to?</p> <p>12 A She -- I -- I know that she was not offered</p> <p>13 the same position, because -- for two reasons: One,</p> <p>14 because of the patient population, and two, because we</p> <p>15 actually didn't have any openings in that area. But I</p> <p>16 can't -- I'm not remembering what -- I'm not</p> <p>17 remembering exactly where we offered her a position.</p> <p>18 Q By the patient population, do you mean --</p> <p>19 what do you mean by patient population?</p> <p>20 A Immunocompromised children.</p> <p>21 Q How did you -- you're not an expert on --</p> <p>22 you're not a medical provider, correct?</p> | <p style="text-align: right;">52</p> <p>1 this list that the job profile and cost center don't</p> <p>2 correspond to the reinstatement offer on the -- as are</p> <p>3 shown on the chart?</p> <p>4 A I don't -- not that I can think of. The --</p> <p>5 let me think. I'm kind of just pulling this out of my</p> <p>6 head, so I'm not -- I'm not a hundred percent</p> <p>7 confident. Um, the reinstatement offer I believe for</p> <p>8 Ehrlich was for a different cost center. It was a</p> <p>9 manager role. I think the title was a little bit</p> <p>10 different, but the function was the same.</p> <p>11 Loflin we talked about. Um, Tyson, I think</p> <p>12 was a different cost center. I don't remember</p> <p>13 exactly, honestly.</p> <p>14 Q Well, if we're looking at the increases</p> <p>15 that are shown here, and we're trying to -- you</p> <p>16 understand that the topic, or part of the topics that</p> <p>17 you were designated to testify was about increases</p> <p>18 that these plaintiffs would have received if they had</p> <p>19 continued in that same position.</p> <p>20 A Yes.</p> <p>21 Q Okay. And so when we look at the</p> <p>22 increases -- well, just starting with Rebecca Loflin,</p> |



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| <p style="text-align: right;">53</p> <p>1 since we know that she was not offered the same job.</p> <p>2 Is that -- is that a fair characterization, that</p> <p>3 Ms. Loflin was not offered the same job?</p> <p>4 <b>A If by job you mean the same title in the</b></p> <p>5 <b>same department, yes.</b></p> <p>6 Q Okay. So I'll use those terms to be more</p> <p>7 clear. So Ms. Loflin was not offered the same title</p> <p>8 in the same department at UVA Health when, when there</p> <p>9 was an offer made to her in February of 2023 by UVA</p> <p>10 Health; is that correct?</p> <p>11 MS. McGRAW: And I'll just note for the</p> <p>12 record that the reinstatement offers and what the job</p> <p>13 title and department were speak for themselves. But</p> <p>14 you can respond.</p> <p>15 BY MR. DIEHL:</p> <p>16 Q Well, okay. We'll keep going. But I guess</p> <p>17 you created this spreadsheet, right?</p> <p>18 <b>A Yes.</b></p> <p>19 Q And you created it for today for the topics</p> <p>20 that you were designated to testify about, right?</p> <p>21 <b>A Yes.</b></p> <p>22 Q So I'm trying to understand the</p> | <p style="text-align: right;">55</p> <p>1 <b>A The --</b></p> <p>2 Q Like, I guess equalizing for seniority or</p> <p>3 other issues that might affect it that aren't related</p> <p>4 to where they work.</p> <p>5 MS. McGRAW: See -- I'll let you answer</p> <p>6 that question, and then I'd like to talk to you off</p> <p>7 the record, because I think you're misunderstanding</p> <p>8 each other, and I don't want to do it on the record,</p> <p>9 because I know that'll upset you.</p> <p>10 MR. DIEHL: Yeah, sure. Do you want us to</p> <p>11 step -- to go off the record for a second?</p> <p>12 MS. McGRAW: Yeah. Why don't you and I go</p> <p>13 out? I don't want to suggest anything to her, but I</p> <p>14 do think you're misunderstanding something.</p> <p>15 MR. DIEHL: Yeah. No, no. And I do find</p> <p>16 stuff like this really helpful, because I -- I've been</p> <p>17 in that situation, and you don't want to get yelled</p> <p>18 at. But I wouldn't yell at you of course.</p> <p>19 (Recess taken, 10:40 a.m. to 10:41 a.m.)</p> <p>20 BY MR. DIEHL:</p> <p>21 Q So we just took a short break, and</p> <p>22 Ms. McGraw and I had a helpful conversation.</p>  |
| <p style="text-align: right;">54</p> <p>1 information.</p> <p>2 So with respect to the, Ms. Loflin's title</p> <p>3 and the cost center that she worked in, do you know</p> <p>4 that the reinstatement offer number -- well, the</p> <p>5 reinstatement offer number was for a different -- a</p> <p>6 position with a different title and a different cost</p> <p>7 center; is that correct?</p> <p>8 <b>A A different cost center.</b></p> <p>9 Q Same title?</p> <p>10 <b>A Yes.</b></p> <p>11 Q Okay. And do you know if employees at UVA</p> <p>12 in different cost centers are in lockstep if they have</p> <p>13 the same title?</p> <p>14 MS. McGRAW: Object to the form.</p> <p>15 BY MR. DIEHL:</p> <p>16 Q Lockstep in terms of pay? Let me ask that</p> <p>17 over. Do you know what "lockstep" means?</p> <p>18 <b>A Yes.</b></p> <p>19 Q Okay. So with respect to pay, does an RN</p> <p>20 Care Coordinator Clinician II, at any -- working in</p> <p>21 any part at UVA, does that have the same pay rate at</p> <p>22 any given time?</p>   | <p style="text-align: right;">56</p> <p>1 So maybe I want to ask you this: How was</p> <p>2 the reinstatement offer rate determined for, for any</p> <p>3 of these individuals in early 2023 or whenever the,</p> <p>4 those -- that rate was determined?</p> <p>5 <b>A The rate was determined based on a couple</b></p> <p>6 <b>of things, but with the underlying assumption that the</b></p> <p>7 <b>individual did not term and stayed in position in good</b></p> <p>8 <b>standing from the term date to the reinstatement date.</b></p> <p>9 <b>So, the adjustment included any merit increases that</b></p> <p>10 <b>might have happened, and it also included any</b></p> <p>11 <b>market-related adjustments that were made to, to pay</b></p> <p>12 <b>in that job.</b></p> <p>13 Q So, to the extent their cost center was</p> <p>14 different, am I correct that the reinstatement offer</p> <p>15 rate was determined based on their previous job</p> <p>16 profile and cost center, not any new job profile and</p> <p>17 cost center?</p> <p>18 <b>A That's correct.</b></p> <p>19 Q And then I got -- with respect to the</p> <p>20 increases that are shown here, are those increases</p> <p>21 that would have been tied to their, the job profile</p> <p>22 that they held at the -- in November 2021, or were</p> |



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| <p style="text-align: right;">57</p> <p>1 they tied to any new job, if there was a difference,<br/>2 in the reinstatement offer?</p> <p>3 <b>A It was based on the prior job, or the</b><br/>4 <b>equivalent. So, as an example, Mark Ehrlich's job</b><br/>5 <b>title doesn't exist that way, and so I used a similar</b><br/>6 <b>position to determine the rate, um, similar in terms</b><br/>7 <b>of job responsibilities.</b></p> <p>8 Q The -- by -- so the Manager Patient<br/>9 Friendly Access POD, that job profile from<br/>10 November 2021, you said that that job doesn't exist?</p> <p>11 <b>A They've changed the job title. It doesn't</b><br/>12 <b>exist with that title.</b></p> <p>13 Q Would -- but does the position exist, just<br/>14 with a different title?</p> <p>15 <b>A Correct.</b></p> <p>16 MR. DIEHL: I think it would be a good time<br/>17 for a break. I know we just took one, but I didn't<br/>18 get Diet Coke.</p> <p>19 MS. McGRAW: Okay.</p> <p>20 (Recess taken, 10:44 a.m. to 11:02 a.m.)</p> <p>21 BY MR. DIEHL:</p> <p>22 Q All right. Thanks for that. We took a</p>  | <p style="text-align: right;">59</p> <p>1 <b>occurred as a result -- that had been coded as a</b><br/>2 <b>result of the COVID vaccination requirement.</b></p> <p>3 Q Did that have --</p> <p>4 MS. McGRAW: It's the same spreadsheet you<br/>5 have.</p> <p>6 MR. DIEHL: Okay. I was gonna say, that's<br/>7 the spreadsheet that was produced in discovery that's<br/>8 the summary for the --</p> <p>9 MS. McGRAW: For the denied.</p> <p>10 MR. DIEHL: -- denied exemptions?</p> <p>11 MS. McGRAW: And you can do some sorting on<br/>12 it, yeah.</p> <p>13 BY MR. DIEHL:</p> <p>14 Q Okay. And anything else that you recall<br/>15 looking at? And I'm not asking for anything<br/>16 attorney-client privilege, but just documents or<br/>17 spreadsheets?</p> <p>18 <b>A I think that -- the only other thing that I</b><br/>19 <b>can think of is, is the -- reviewed the VaxTrax system</b><br/>20 <b>information that had been provided.</b></p> <p>21 Q Was that -- I can pull up an exhibit if<br/>22 that's helpful, but was that the printouts of</p>  |
| <p style="text-align: right;">58</p> <p>1 break and we're back on the record here. What did you<br/>2 do to prepare for today's deposition?</p> <p>3 <b>A I reviewed documents, a couple of</b><br/>4 <b>spreadsheets, and I talked with [REDACTED] and</b><br/>5 <b>Melissa Frederick briefly, and worked with my</b><br/>6 <b>attorneys.</b></p> <p>7 Q Do you recall any specific documents that<br/>8 you looked at?</p> <p>9 <b>A Yes. There, there was a document that</b><br/>10 <b>listed the terminations that occurred in 2021. Um,</b><br/>11 <b>policies. The OCH policy I looked at. I'm trying to</b><br/>12 <b>think of, what else did I look at? The -- the</b><br/>13 <b>training document, that document.</b></p> <p>14 Q You're referring to Exhibit 26-C?</p> <p>15 <b>A Yes.</b></p> <p>16 Q And I assume the other documents --</p> <p>17 <b>A The documents.</b></p> <p>18 Q -- that are included in Exhibit 26?</p> <p>19 <b>A Correct, yes.</b></p> <p>20 Q What spreadsheets were you referring to?</p> <p>21 <b>A There was a spreadsheet that had been</b><br/>22 <b>provided to me that identified terminations that had</b></p> | <p style="text-align: right;">60</p> <p>1 information that was provided in the lawsuit, or did<br/>2 you actually look in the VaxTrax system<br/>3 electronically?</p> <p>4 <b>A Both.</b></p> <p>5 Q Anything else that you recall looking at?</p> <p>6 <b>A No.</b></p> <p>7 Q What did you and [REDACTED] discuss?</p> <p>8 <b>A I talked with [REDACTED] -- I asked [REDACTED] a couple</b><br/>9 <b>of questions about the process that was utilized back</b><br/>10 <b>in 2021.</b></p> <p>11 Q What did you ask about?</p> <p>12 <b>A Specifically, I asked [REDACTED] to clarify how</b><br/>13 <b>the exemption requests were received and distributed</b><br/>14 <b>amongst the committee members for review, and the</b><br/>15 <b>function of the committee.</b></p> <p>16 Q What -- what did you say about how requests<br/>17 were received and distributed?</p> <p>18 <b>A [REDACTED] shared that the requests came in</b><br/>19 <b>through VaxTrax for current employees, and through</b><br/>20 <b>another system, Qualtrics, for applicants. [REDACTED] shared</b><br/>21 <b>that [REDACTED] distributed the exemption requests equally</b><br/>22 <b>amongst the committee members.</b></p> |



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| <p>61</p> <p>1 Q Did you review any of [REDACTED] deposition<br/>2 testimony?</p> <p>3 A I did not.</p> <p>4 Q Did you review any deposition testimony<br/>5 that was given by [REDACTED] in this lawsuit?</p> <p>6 A I did not.</p> <p>7 Q Did you speak to Costi Sifri in relation to<br/>8 this lawsuit?</p> <p>9 A No.</p> <p>10 Q And you said you spoke with Melissa<br/>11 Frederick?</p> <p>12 A Yes.</p> <p>13 Q What did you -- what did you -- what do you<br/>14 recall from that conversation?</p> <p>15 A I asked -- I asked her similar questions.<br/>16 The additional question that I asked her is how the<br/>17 committee members were identified.</p> <p>18 Q And what did Ms. Frederick say?</p> <p>19 A She indicated that the business partners<br/>20 were chosen to be on the committee because they had<br/>21 employee relations experience. They were used to<br/>22 operating in the gray so to speak. She chose an odd</p>                 | <p>63</p> <p>1 A Meaning, were able to take information in<br/>2 and make recommendations based on that information<br/>3 without being predisposed one way or the other; not<br/>4 being -- not needed a policy to say, This is the way<br/>5 that this has to happen.</p> <p>6 Q Did Ms. Frederick define what she meant by<br/>7 operating in the gray?</p> <p>8 A Very vaguely, yes. Kind of like what I<br/>9 just said.</p> <p>10 Q So what you just said, is that something<br/>11 Ms. Frederick said to you?</p> <p>12 A Not -- not in those words. Not exactly.</p> <p>13 Q Do you recall -- maybe not exactly, but do<br/>14 you recall generally what Ms. Frederick said about<br/>15 what she meant by operating in the gray?</p> <p>16 A I don't remember exactly what she said, but<br/>17 the indication that I took from that was what I said.</p> <p>18 Q But she -- you do recall, just to be clear,<br/>19 that Ms. Frederick said, quote, operating in the gray,<br/>20 end quote?</p> <p>21 A I do remember that, yes.</p> <p>22 Q Anything else you recall from your</p>  |
| <p>62</p> <p>1 number to ensure that if there was disagreement, that<br/>2 there would be a majority. So --</p> <p>3 Q Anything else that she said during your<br/>4 conversation?</p> <p>5 A No.</p> <p>6 Q What does -- what does "employee relations<br/>7 experience" mean?</p> <p>8 A Meaning they had worked in, you know,<br/>9 conflict resolution and investigations and things of<br/>10 that nature, so that they were able to take<br/>11 information in and objectively review it, and make<br/>12 recommendations based on that information.</p> <p>13 Q Did they, these committee members, have the<br/>14 employee relations experience while they worked for<br/>15 UVA, do you know?</p> <p>16 A I don't know off the top of my head, no.</p> <p>17 Q And Ms. Fredericks, (sic) did she -- did<br/>18 she say?</p> <p>19 A She did not say. I did not ask. She did<br/>20 not say.</p> <p>21 Q What did she mean by "operating in the<br/>22 gray"?</p> | <p>64</p> <p>1 conversation with Ms. Frederick?</p> <p>2 A She -- I asked her how often the committee<br/>3 met. She said, um, in the beginning, they met several<br/>4 times per week, and then it became more like two times<br/>5 a week, as the volume was dealt with.</p> <p>6 Q Anything else?</p> <p>7 A Um, I asked her what her role was. Was<br/>8 she -- you know, was she someone who, for lack of a<br/>9 better term, voted in the discussion? And she said<br/>10 no, that she was there for consultative purposes, or<br/>11 in the event that the group couldn't come to an<br/>12 agreement on whether, you know, whether criteria had<br/>13 been met or not, that she would -- she would step in.<br/>14 But she shared that she never had to do that.</p> <p>15 Q Anything else you recall from your<br/>16 conversation with Ms. Frederick?</p> <p>17 A I -- I asked her if there were other<br/>18 consultative individuals who were associated or<br/>19 supporting the committee. She indicated that<br/>20 university counsel was available to consult, as well<br/>21 as our equal employment opportunity group. If needed,<br/>22 they could consult as well.</p> |



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| <p>65</p> <p>1 Q You said anyone -- any other consultative,</p> <p>2 is that the word you used?</p> <p>3 A <b>Yeah, any other --</b></p> <p>4 Q What did you mean by -- so you said</p> <p>5 university counsel and the EEO group.</p> <p>6 A <b>Uh-huh.</b></p> <p>7 Q That's "yes"?</p> <p>8 A <b>Yes. Sorry.</b></p> <p>9 Q And is there anyone else you were referring</p> <p>10 to or she responded to, I guess either one, when you</p> <p>11 were talking about consultative, people who might be</p> <p>12 consultative to the committee?</p> <p>13 A <b>No others.</b></p> <p>14 Q Did Ms. Frederick say that the EEO group --</p> <p>15 MS. MCGRAW: It's just one E, EOCR.</p> <p>16 BY MR. DIEHL:</p> <p>17 Q I always do that. So that's the EOCR</p> <p>18 office? Is that correct?</p> <p>19 A <b>Correct.</b></p> <p>20 Q And the EOCR office is, did -- did</p> <p>21 Ms. Frederick say whether anyone from that office did</p> <p>22 consult with the committee?</p>   | <p>67</p> <p>1 Q I'm just asking for the date, and I'll ask</p> <p>2 you about the length. Just, I'm not asking for</p> <p>3 anything that was said, but when did you meet with</p> <p>4 legal counsel related to this deposition?</p> <p>5 A <b>I would have to look at my calendar. I</b></p> <p>6 <b>don't remember the dates.</b></p> <p>7 Q Was it recently?</p> <p>8 A <b>Can you tell me what you mean by</b></p> <p>9 <b>"recently"?</b></p> <p>10 Q Was it more than a month ago?</p> <p>11 A <b>No.</b></p> <p>12 Q Was it more than two weeks ago?</p> <p>13 A <b>The first time, probably, yes.</b></p> <p>14 Q In relation to your, your discussion with</p> <p>15 Ms. Frederick, did you meet with counsel before, or</p> <p>16 after, or both?</p> <p>17 A <b>Both.</b></p> <p>18 Q So when did you meet with counsel</p> <p>19 approximately before you spoke with Ms. Frederick?</p> <p>20 A <b>It was probably a month or so ago. I'm bad</b></p> <p>21 <b>with dates. I don't remember. They all -- all the</b></p> <p>22 <b>days run into each other.</b></p> |
| <p>66</p> <p>1 A <b>She -- I believe she said no, that they did</b></p> <p>2 <b>not need to, but they were available.</b></p> <p>3 Q You believe that, but you're not certain?</p> <p>4 A <b>I'm not a hundred percent sure, but I</b></p> <p>5 <b>believe that is what she said.</b></p> <p>6 Q Do you recall anything else that you and</p> <p>7 Ms. Frederick discussed?</p> <p>8 A <b>No.</b></p> <p>9 Q How long did you speak to Ms. Frederick?</p> <p>10 A <b>I think it was maybe ten minutes.</b></p> <p>11 Q And when -- on what date was that, or day,</p> <p>12 if you recall? Was it this week?</p> <p>13 A <b>It was not this week. It -- I believe it</b></p> <p>14 <b>was a couple weeks ago. Two weeks ago maybe. Two or</b></p> <p>15 <b>three weeks ago.</b></p> <p>16 Q And when did you speak to [REDACTED]?</p> <p>17 A <b>Same.</b></p> <p>18 Q A couple weeks ago?</p> <p>19 A <b>It was a couple weeks ago, yeah.</b></p> <p>20 Q Anyone else that you spoke to in preparing</p> <p>21 for this deposition, other than attorneys?</p> <p>22 A <b>No.</b></p> | <p>68</p> <p>1 Q They're always so exciting -- everyone's so</p> <p>2 exciting. That's not a question.</p> <p>3 So, how long approximately did you meet</p> <p>4 with the lawyers that first time you met them?</p> <p>5 A <b>Several hours.</b></p> <p>6 Q And don't tell me anything that was said,</p> <p>7 but who was there at that meeting?</p> <p>8 A <b>Um, Wendy McGraw and Matt Kirsner.</b></p> <p>9 Q Anyone else?</p> <p>10 A <b>In that first meeting, no.</b></p> <p>11 Q And then did you meet -- you mentioned you</p> <p>12 did meet again with legal counsel in relation to this</p> <p>13 deposition?</p> <p>14 A <b>Yes.</b></p> <p>15 Q When was that? The next time.</p> <p>16 A <b>That was probably a couple of weeks ago,</b></p> <p>17 <b>and that was via phone, or Zoom, or Webex. One of</b></p> <p>18 <b>those.</b></p> <p>19 Q Some form of electronic communication?</p> <p>20 A <b>Some video. Yeah, video. It was a video</b></p> <p>21 <b>conference.</b></p> <p>22 Q And who was present -- again, nothing --</p>                            |



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| <p style="text-align: right;">69</p> <p>1 I'm not asking for what was said. Who was present for<br/>2 that second meeting with counsel?<br/>3 <b>A Same. Actually, can I correct my first</b><br/>4 <b>one?</b><br/>5 Q Sure.<br/>6 <b>A Melissa Riley was at the first meeting,</b><br/>7 <b>too.</b><br/>8 Q And you're referring -- you looked over,<br/>9 and you're referring to Melissa Wolf Riley that's here<br/>10 present today? And Mr. Kirsner's here as well, just<br/>11 to note that for the record. I don't know that we<br/>12 actually put that on the record. Welcome. I don't<br/>13 know what one says when you do that in the middle,<br/>14 but -- I always try to make people feel comfortable.<br/>15 MR. KIRSNER: Thank you.<br/>16 BY MR. DIEHL:<br/>17 Q So the -- in the first meeting, Ms. Riley<br/>18 was present in that meeting?<br/>19 <b>A Yes.</b><br/>20 Q And then the second meeting was with<br/>21 Ms. McGraw and Mr. Kirsner?<br/>22 <b>A Yes.</b></p> | <p style="text-align: right;">71</p> <p>1 <b>A It's actually -- oh, sorry.</b><br/>2 MS. McGRAW: Go ahead.<br/>3 BY MR. DIEHL:<br/>4 Q Yeah. I guess, what does grounds mean?<br/>5 I'm just trying to understand that.<br/>6 <b>A Grounds is the UVA vernacular for campus.</b><br/>7 <b>You need to use the word "grounds."</b><br/>8 Q The grounds -- the grounds in C-ville where<br/>9 you met? See, look at me.<br/>10 Okay. And then did you do anything else to<br/>11 prepare for today's deposition other than what you've<br/>12 already mentioned?<br/>13 <b>A We had a brief phone call on Tuesday to go</b><br/>14 <b>over a couple of things, yes. Meaning Wendy and Matt.</b><br/>15 <b>I don't remember if Melissa was on that call.</b><br/>16 Q Anything else other than what you've<br/>17 already mentioned in regard to your preparation?<br/>18 <b>A No.</b><br/>19 Q Um, if you could pull up Exhibit 26-A, the<br/>20 note there.<br/>21 <b>A Okay.</b><br/>22 Q And where did these numbers come from?</p>   |
| <p style="text-align: right;">70</p> <p>1 Q How long was the second meeting?<br/>2 <b>A I think that was about an hour.</b><br/>3 Q And did you meet with anyone else after<br/>4 the -- other than the meetings that we've already<br/>5 talked about in relation to your preparation for this<br/>6 deposition?<br/>7 <b>A Yes.</b><br/>8 Q Who was that?<br/>9 <b>A Last week I met with, with Wendy. Melissa</b><br/>10 <b>Riley was there. Matt Kirsner was on Zoom. And that</b><br/>11 <b>was the final in-person preparation meeting that we</b><br/>12 <b>had.</b><br/>13 Q How long was that in-person preparation<br/>14 meeting?<br/>15 <b>A That was around, about three, three hours</b><br/>16 <b>or so, four hours, something like that.</b><br/>17 Q And where was that meeting?<br/>18 <b>A That was held on grounds at the O'Neil</b><br/>19 <b>Hall.</b><br/>20 Q So grounds means on -- at a UVA Health<br/>21 facility?<br/>22 MS. McGRAW: Object to the form.</p>          | <p style="text-align: right;">72</p> <p>1 <b>A These numbers were shared with me by</b><br/>2 <b>counsel.</b><br/>3 MS. McGRAW: And I'll just note for the<br/>4 record, they come straight off the spreadsheets that<br/>5 have been produced, and a review of the VaxTrax<br/>6 records underlying those spreadsheets.<br/>7 BY MR. DIEHL:<br/>8 Q Do you know if these numbers include all of<br/>9 the individuals that submitted exemption requests<br/>10 through the VaxTrax system in 2021?<br/>11 <b>A As far as I know, yes.</b><br/>12 Q But you don't -- do you know that, or do<br/>13 you not -- I guess, are you guessing?<br/>14 <b>A I -- if they came out of VaxTrax, then yes,</b><br/>15 <b>those were what was submitted. If that's where these</b><br/>16 <b>numbers came from, which is what counsel said.</b><br/>17 Q Okay. So you -- I'm not trying to be<br/>18 tricky. I just, you don't know -- you're relying on<br/>19 what Ms. McGraw said in relation to where these<br/>20 numbers came from?<br/>21 MS. McGRAW: She's relying on the documents<br/>22 that were produced in the case.</p> |



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| <p style="text-align: right;">73</p> <p><b>1 A Yeah. I'm relying on the document, yes.</b></p> <p><b>2 BY MR. DIEHL:</b></p> <p><b>3 Q</b> Well, that -- so you, you're relying on a</p> <p><b>4</b> spreadsheet that you received that you understand was</p> <p><b>5</b> produced in this lawsuit?</p> <p><b>6 A Yes.</b></p> <p><b>7 Q</b> And the -- the 93 new, what -- what -- your</p> <p><b>8</b> writing is quite nice, but, um, I don't understand the</p> <p><b>9</b> first, next to the -- it looks like a 50, and then it</p> <p><b>10</b> says prior, and what is that? Is that flu?</p> <p><b>11 A Yes.</b></p> <p><b>12 Q</b> Sorry. I was actually figuring it out as I</p> <p><b>13</b> was reading it. So those would be 50 individuals that</p> <p><b>14</b> had -- that were approved as a result of a previous</p> <p><b>15</b> influenza vaccine religious exemption approval in 2019</p> <p><b>16</b> or 2020? Is that correct?</p> <p><b>17 A Correct.</b></p> <p><b>18 Q</b> And then there's 30 that were remote</p> <p><b>19</b> employees. That's what "remote" refers to?</p> <p><b>20 A Yes, 100 percent remote.</b></p> <p><b>21 Q</b> And then ten were new individuals that</p> <p><b>22</b> submitted requests for religious exemption in 2021,</p> | <p style="text-align: right;">75</p> <p><b>1</b> either correlates to his name or has his name attached</p> <p><b>2</b> to that information? Is that correct?</p> <p><b>3 A Correct.</b></p> <p><b>4 Q</b> And -- and if you went into the VaxTrax</p> <p><b>5</b> system and you looked at Mark Ehrlich's request in the</p> <p><b>6</b> information in VaxTrax, could you understand why his</p> <p><b>7</b> exemption request was denied in 2021?</p> <p><b>8</b> MS. McGRAW: Object to the form. You can</p> <p><b>9</b> answer.</p> <p><b>10 A I can't. I can -- I can relay the criteria</b></p> <p><b>11 that were used, but I can't put myself back three</b></p> <p><b>12 years and where that committee was and what the</b></p> <p><b>13 discussion was.</b></p> <p><b>14 BY MR. DIEHL:</b></p> <p><b>15 Q</b> Yeah, I'm not asking about the discussion.</p> <p><b>16</b> I'm asking does -- maybe an easier way to ask it, does</p> <p><b>17</b> VaxTrax show you, is there someplace in VaxTrax you</p> <p><b>18</b> can look where it shows the rationale or reasons why</p> <p><b>19</b> the committee or any individual viewer denied an</p> <p><b>20</b> individual's requests for religious exemption in 2021?</p> <p><b>21 A No.</b></p> <p><b>22 Q</b> Is there some other place that you could</p>  |
| <p style="text-align: right;">74</p> <p><b>1</b> but had not previously; is that correct?</p> <p><b>2 A Correct.</b></p> <p><b>3 Q</b> Um, if, if you didn't have this</p> <p><b>4</b> spreadsheet, and you just had the information from</p> <p><b>5</b> VaxTrax, would you under -- well, do you know why</p> <p><b>6</b> individuals that were denied, why their exemption</p> <p><b>7</b> requests were denied?</p> <p><b>8</b> MS. McGRAW: Object to the form, overbroad.</p> <p><b>9 A I -- I don't know the in -- you know, the</b></p> <p><b>10 exact reason why it was denied, no.</b></p> <p><b>11 BY MR. DIEHL:</b></p> <p><b>12 Q</b> So, just hypothetically, if you were to</p> <p><b>13</b> look in VaxTrax and see the information that's there,</p> <p><b>14</b> you could do that, correct?</p> <p><b>15 A Yes.</b></p> <p><b>16 Q</b> And so if you went and you found an</p> <p><b>17</b> individual that was terminated in 2021, let's just use</p> <p><b>18</b> Mark Ehrlich as an example, you could find the</p> <p><b>19</b> information Mark Ehrlich submitted in the VaxTrax</p> <p><b>20</b> system; is that correct?</p> <p><b>21 A Yes.</b></p> <p><b>22 Q</b> And there's a way to do that by -- that</p>   | <p style="text-align: right;">76</p> <p><b>1</b> look if you wanted to find out the specific reasons</p> <p><b>2</b> why any individual who requested a religious exemption</p> <p><b>3</b> through VaxTrax in 2021, and if they were denied in</p> <p><b>4</b> 2021, is there a place you could look to find the</p> <p><b>5</b> reasons why they were denied by any reviewer or by the</p> <p><b>6</b> committee in 2021?</p> <p><b>7 A No. There's not -- there's not a place</b></p> <p><b>8 where individual reasons are noted, no.</b></p> <p><b>9 Q</b> Was there -- did individual reviewers or</p> <p><b>10</b> the committee write down notes related to their</p> <p><b>11</b> decision-making regarding individuals in 2021 -- well,</p> <p><b>12</b> let me start that over.</p> <p><b>13</b> So I'm asking about -- just so I don't have</p> <p><b>14</b> to ask you a very long question; it gets hard to do --</p> <p><b>15</b> I'm asking about individuals who requested a religious</p> <p><b>16</b> exemption through VaxTrax in 2021, and then those</p> <p><b>17</b> requests were -- the request for religious exemption</p> <p><b>18</b> was denied. Do you understand that premise?</p> <p><b>19 A Yes.</b></p> <p><b>20 Q</b> Okay. So if I wanted to go back and look</p> <p><b>21</b> up why a person was denied, any individual on that</p> <p><b>22</b> spreadsheet that was denied, is there a place I could</p> |



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| <p style="text-align: right;">77</p> <p>1 go to find out why they were denied?</p> <p>2 <b>A Not to my knowledge.</b></p> <p>3 Q Is there -- do you know, when you spoke to</p> <p>4 [REDACTED] or otherwise, does the committee members</p> <p>5 know why individuals were denied?</p> <p>6 MS. McGRAW: Object to the form. You can</p> <p>7 respond.</p> <p>8 <b>A Not -- that's not something that I</b></p> <p>9 <b>discussed with, with [REDACTED] or Ms. Frederick.</b></p> <p>10 <b>BY MR. DIEHL:</b></p> <p>11 Q Do you know of any way that, that you or</p> <p>12 someone else with access to UVA's systems, or access</p> <p>13 to UVA's employees, could identify the specific</p> <p>14 reasons why any request for a religious exemption was</p> <p>15 denied in 2021?</p> <p>16 <b>A Not to my knowledge.</b></p> <p>17 Q Who -- in 2021, there was a process for</p> <p>18 reviewing religious exemptions, including as shown on</p> <p>19 Exhibit 26-C; is that correct?</p> <p>20 <b>A Yes.</b></p> <p>21 Q Who made decisions about this process at</p> <p>22 UVA?</p>  | <p style="text-align: right;">79</p> <p>1 <b>leadership of UVA.</b></p> <p>2 Q Who are you referring to specifically in</p> <p>3 terms of senior leadership?</p> <p>4 <b>A There was a group that met regularly about</b></p> <p>5 <b>COVID. I believe it's in one of the other documents,</b></p> <p>6 <b>the individuals who were included.</b></p> <p>7 Q Are you referring to Exhibit 26-B, and if</p> <p>8 you go to the third page that's not numbered, but do</p> <p>9 you see that it says Amended Answer to Interrogatory</p> <p>10 1? So you're looking at the first page I think. If</p> <p>11 you could go to the third page of Exhibit 26-B. Tell</p> <p>12 me when you're there.</p> <p>13 <b>A The third, yes.</b></p> <p>14 Q And then do you see where it says in bold</p> <p>15 and underlined, Amended Answer to Interrogatory Number</p> <p>16 1?</p> <p>17 <b>A Yes.</b></p> <p>18 Q And then there's some information that's</p> <p>19 not names, but then down at the bottom it begin --</p> <p>20 there's a list of names that begins with K. Craig</p> <p>21 Kent?</p> <p>22 <b>A Yes.</b></p>                                     |
| <p style="text-align: right;">78</p> <p>1 <b>A About the -- during the process, or about</b></p> <p>2 <b>what the process --</b></p> <p>3 <b>BY MR. DIEHL:</b></p> <p>4 Q Sure. When I'm talking -- I'm asking about</p> <p>5 how this process was created. Let's start there.</p> <p>6 Other than I believe counsel, Ms. Wolf Riley, is --</p> <p>7 was there a decision-maker at UVA that made decisions</p> <p>8 regarding the religious accommodation process in 2021?</p> <p>9 <b>A From my understanding, the process was</b></p> <p>10 <b>developed based on a couple of things: EEOC --</b></p> <p>11 Q So, let me ask you this: I'm asking about</p> <p>12 people. My question's about people.</p> <p>13 <b>A Okay.</b></p> <p>14 Q Decision-makers.</p> <p>15 <b>A I am not --</b></p> <p>16 Q So that wasn't clear.</p> <p>17 <b>A Okay.</b></p> <p>18 Q Do you know who made decisions about --</p> <p>19 wherever the source was, do you know who made</p> <p>20 decisions about that process at UVA in 2021?</p> <p>21 <b>A The process was developed through</b></p> <p>22 <b>consultation with counsel, and was approved by senior</b></p> | <p style="text-align: right;">80</p> <p>1 Q And that list continues, Wendy Horton --</p> <p>2 and I'm omitting their titles, but K. Craig Kent,</p> <p>3 Costi Sifri, Reid Adams, Bobby -- how do you say the</p> <p>4 last name? It is Chhabra?</p> <p>5 <b>A Yeah, I think it got -- I think it got cut</b></p> <p>6 <b>off of the one I'm looking at. Let me see. Because</b></p> <p>7 <b>I'm looking at the wrong one. Yeah.</b></p> <p>8 MR. DIEHL: Let's go off the record for</p> <p>9 just a second.</p> <p>10 (Recess taken, 11:30 a.m. to 11:31 a.m.)</p> <p>11 BY MR. DIEHL:</p> <p>12 Q So we're back on the record, and I'm</p> <p>13 handing you a document that's previously marked as</p> <p>14 Exhibit 22. And -- and just note, that's a five-page</p> <p>15 exhibit. Can you just double-check that?</p> <p>16 <b>A Yes.</b></p> <p>17 Q And if you go to the third page of</p> <p>18 Exhibit 22 -- well, and before we do that, before I</p> <p>19 ask you that, Exhibit 22 that I've handed you is the</p> <p>20 same as Exhibit 26-B; is that correct? Or it's</p> <p>21 intended to be the same as 26-B?</p> <p>22 <b>A Yes.</b></p> |



Transcript of Kathleen (Katy) Hoffman, Corporate Representative 21 (81 to 84)

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| <p>81</p> <p>1 Q And -- and we just had a missing page</p> <p>2 there. So I'm going to ask you about Exhibit 22. And</p> <p>3 turning to the third page where it says Amended Answer</p> <p>4 to Interrogatory Number 1. And then do you see where</p> <p>5 it says K. Craig Kent?</p> <p>6 A Yes.</p> <p>7 Q And that continues Wendy Horton, Costi</p> <p>8 Sifri, Reid Adams, Bobby Chhabra? Is that correct?</p> <p>9 Did I say that right?</p> <p>10 A I believe so.</p> <p>11 Q Pam Cipriano, Mitchell Rosner, David</p> <p>12 Wilkes. And that's the list of individuals named</p> <p>13 there?</p> <p>14 A Yes.</p> <p>15 Q And so is that who you're referring to when</p> <p>16 you said the leadership group? Or I guess, is -- are</p> <p>17 those the individuals who made decisions regarding the</p> <p>18 religious exemption process in 2021?</p> <p>19 MS. McGRAW: Object to the form.</p> <p>20 BY MR. DIEHL:</p> <p>21 Q I guess, do those individuals have any</p> <p>22 relationship to decisions about the religious</p>   | <p>83</p> <p>1 MS. McGRAW: I'm just going to note for the</p> <p>2 record, when you say 2021, you mean the 2021 review</p> <p>3 process, or the 2021 calendar year?</p> <p>4 MR. DIEHL: Well, let's ask.</p> <p>5 BY MR. DIEHL:</p> <p>6 Q So in 2021, the religious accommodation</p> <p>7 review process that we've talked about somewhat today,</p> <p>8 that process was created when the, the requirement</p> <p>9 that, that certain employees, whether new employees or</p> <p>10 current employees, when certain employees were</p> <p>11 required to receive the COVID vaccine; is that</p> <p>12 correct?</p> <p>13 A Yes.</p> <p>14 Q So that was -- this -- it's my</p> <p>15 understanding from an interrogatory answer, that</p> <p>16 this -- the training that, at which Exhibit 26-C was</p> <p>17 presented was, I believe it was on July 1st, 2021. Is</p> <p>18 that your understanding?</p> <p>19 A Yeah, around that time. I don't know the</p> <p>20 exact date.</p> <p>21 Q And is it your understanding that the</p> <p>22 process that is laid, set forth in Exhibit 26-C, that</p> |
| <p>82</p> <p>1 exemption process in 2021?</p> <p>2 A Yes. My understanding is yes.</p> <p>3 Q What is their relationship of the</p> <p>4 individuals listed in the Amended Answer to</p> <p>5 Interrogatory Number 1 that I just read, to the</p> <p>6 religious exemption process in 2021?</p> <p>7 A That group met regularly to discuss the</p> <p>8 COVID vaccination requirement, among other topics,</p> <p>9 inclusive of any exemptions.</p> <p>10 Q So -- so, it is that group that would have</p> <p>11 made decisions regarding the process that is shown in</p> <p>12 Exhibit 26-C with the advice of counsel?</p> <p>13 A Correct.</p> <p>14 Q How many religious accommodations -- well,</p> <p>15 if you could pull up your notes, just so we have</p> <p>16 something in front of you. Exhibit 26-A, your</p> <p>17 handwritten note, these are numbers from 2021,</p> <p>18 correct?</p> <p>19 A Yes.</p> <p>20 Q So after 2021, how many religious</p> <p>21 accommodations has the University of Virginia denied</p> <p>22 or approved related to the COVID vaccine?</p> | <p>84</p> <p>1 process was determined and laid out in, in</p> <p>2 Exhibit 26-C sometime in 2021 before that July</p> <p>3 training?</p> <p>4 A Yes.</p> <p>5 Q And so when I -- when I referred to the</p> <p>6 religious exemption process of 2021, that, that</p> <p>7 process I'm referring to relates to requests for</p> <p>8 religious exemption regarding the COVID vaccine. Do</p> <p>9 you understand that?</p> <p>10 A Yes.</p> <p>11 Q And the numbers on Exhibit 26-A for</p> <p>12 reviewed, denied, and approved, those were all</p> <p>13 requests related to religious exemptions requesting</p> <p>14 exemption from the COVID vaccine requirement; is that</p> <p>15 correct?</p> <p>16 A Yes.</p> <p>17 Q So with respect to -- well, let me just --</p> <p>18 the COVID vaccine is no longer a required vaccine at</p> <p>19 UVA Health; is that correct?</p> <p>20 A Correct.</p> <p>21 Q So, do you know when that ended?</p> <p>22 A August 2023.</p>   |



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| <p style="text-align: right;">85</p> <p>1 Q And between the end of 2021 and</p> <p>2 August 2023, do you know how many religious exemption</p> <p>3 requests were reviewed and -- well, let's start there.</p> <p>4 Do you know how many religious accommodation requests</p> <p>5 were reviewed by anyone at UVA Health?</p> <p>6 <b>A I don't know off the top of my head, no.</b></p> <p>7 MS. McGRAW: And I'll object. I'm sorry.</p> <p>8 I don't know why I'm apologizing for objecting, but</p> <p>9 it's beyond the scope. We've produced this witness --</p> <p>10 MR. DIEHL: It's not beyond the scope.</p> <p>11 It's beyond the scope of your instruction to the</p> <p>12 witness to prepare, correct?</p> <p>13 MS. McGRAW: It's beyond the scope of what</p> <p>14 we agreed to produce her for. What we -- the numbers</p> <p>15 that you have are for the 2021 review process, which</p> <p>16 is what we agreed to provide. They're not broken down</p> <p>17 by calendar year. If you want that breakdown, we</p> <p>18 could probably do it.</p> <p>19 MR. DIEHL: Oh. So you -- when it says</p> <p>20 2021 numbers, that's 2021 processed numbers?</p> <p>21 MS. McGRAW: Yes.</p> <p>22 MR. DIEHL: Do you know what the end date</p> | <p style="text-align: right;">87</p> <p>1 course we do. And your --</p> <p>2 MR. DIEHL: We wouldn't be lawyers if we</p> <p>3 didn't.</p> <p>4 MS. McGRAW: And we would provide them for</p> <p>5 the COVID vaccine under the 2022 procedure -- yeah.</p> <p>6 MR. DIEHL: With respect to applicants and</p> <p>7 employees?</p> <p>8 MS. McGRAW: For 2022, yes, we can actually</p> <p>9 do it for applicants as well.</p> <p>10 BY MR. DIEHL:</p> <p>11 Q Well, let me ask the witness. The</p> <p>12 information regarding applicants, that -- in 2021,</p> <p>13 that information was received through the Qualtrics</p> <p>14 system; is that correct?</p> <p>15 <b>A Yes, to my knowledge.</b></p> <p>16 Q And that Qualtrics system is still</p> <p>17 accessible to UVA Health?</p> <p>18 <b>A I -- I don't know how far back it saves</b></p> <p>19 <b>things. I don't know that for sure.</b></p> <p>20 Q Do you use Qualtrics as part of your job at</p> <p>21 all?</p> <p>22 <b>A Yes.</b></p>  |
| <p style="text-align: right;">86</p> <p>1 of these -- of this information is? So that would be</p> <p>2 what, like October or something like that? Do you</p> <p>3 know?</p> <p>4 MS. McGRAW: Yeah. It's in the -- it's in</p> <p>5 a response that we have, so whatever I said in the</p> <p>6 response, but I'll get you that number. But it should</p> <p>7 be October 2022.</p> <p>8 MR. DIEHL: Yeah, September or October,</p> <p>9 that time period?</p> <p>10 MS. McGRAW: Yeah. If you feel that you</p> <p>11 need, for your class-action motion, basic raw numbers</p> <p>12 on the 2022 procedure, we can provide those.</p> <p>13 MR. DIEHL: Yes. Yes. That would be</p> <p>14 helpful.</p> <p>15 MS. McGRAW: She's not prepared to do it,</p> <p>16 but we can do it.</p> <p>17 MR. DIEHL: Okay. That was in the notice,</p> <p>18 but -- and I'm just saying that for the record. But</p> <p>19 we'll -- I appreciate the offer, and we'll accept</p> <p>20 that. I mean, we might -- I mean, we reserve our</p> <p>21 disagreements, et cetera, et cetera.</p> <p>22 MS. McGRAW: Just so we're clear -- of</p>  | <p style="text-align: right;">88</p> <p>1 Q And so is -- that system itself is still in</p> <p>2 use by UVA Health?</p> <p>3 <b>A It is, yes.</b></p> <p>4 Q And by UVA Health, you understand what I</p> <p>5 mean by that, correct?</p> <p>6 MS. McGRAW: Object to the form.</p> <p>7 BY MR. DIEHL:</p> <p>8 Q Do you understand what I mean by UVA</p> <p>9 Health?</p> <p>10 <b>A Could you clarify what you mean by UVA</b></p> <p>11 <b>Health?</b></p> <p>12 Q Well, I don't know anything. What does UVA</p> <p>13 Health mean to you?</p> <p>14 <b>A UVA Health is an umbrella term. For my</b></p> <p>15 <b>purposes, it's the Medical Center, it's the School of</b></p> <p>16 <b>Medicine, it's the School of Nursing, because that's</b></p> <p>17 <b>where -- that's what I'm responsible for.</b></p> <p>18 Q So is it fair to characterize it as the</p> <p>19 University of Virginia Health System? Is that</p> <p>20 another -- is that a more, a longer way to say UVA</p> <p>21 Health?</p> <p>22 MS. McGRAW: Object to the form, asked and</p> |



Transcript of Kathleen (Katy) Hoffman, Corporate Representative 23 (89 to 92)

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| <p style="text-align: right;">89</p> <p>1 answered.</p> <p>2 <b>A Frankly, it depends on who you talk to.</b></p> <p>3 <b>BY MR. DIEHL:</b></p> <p>4 Q What -- I guess, what's the -- well,</p> <p>5 we'll -- what would you -- if I said, Do you work for</p> <p>6 the university -- well, I'm -- how about this? Do you</p> <p>7 work for the University of Virginia's Health System?</p> <p>8 <b>A I support UVA's health system that includes</b></p> <p>9 <b>the Medical Center, the School of Medicine, and the</b></p> <p>10 <b>School of Nursing.</b></p> <p>11 Q Because you work on the academic side; is</p> <p>12 that right? Technically?</p> <p>13 <b>A My paycheck comes from the academic side,</b></p> <p>14 <b>yes. My W-2 says -- it doesn't say UVA Health.</b></p> <p>15 Q Are there any other areas that would be</p> <p>16 considered on the academic side of the university that</p> <p>17 support the UVA Health system?</p> <p>18 <b>A Yes.</b></p> <p>19 MS. McGRAW: Objection, beyond the scope,</p> <p>20 but you can answer.</p> <p>21 <b>A Oh, sorry.</b></p> <p>22 MS. McGRAW: You can answer if you know.</p>   | <p style="text-align: right;">91</p> <p>1 <b>regularly work in the medical center who have --</b></p> <p>2 <b>and/or who have direct patient contact or -- yeah. I</b></p> <p>3 <b>mean, those are the primary things.</b></p> <p>4 MS. McGRAW: I'll do a belated objection</p> <p>5 beyond the scope, and that the documents defining Tier</p> <p>6 1 speak for themselves.</p> <p>7 MR. DIEHL: Well, okay.</p> <p>8 BY MR. DIEHL:</p> <p>9 Q So, you understand that Tier 1 Team Members</p> <p>10 was relevant to whether the OCH-002 policy applied to</p> <p>11 individuals, and therefore, they would -- those Tier 1</p> <p>12 Team Members would have been those individuals who</p> <p>13 would have applied for a religious exemption through</p> <p>14 VaxTrax. Is that a fair sequence of logic?</p> <p>15 <b>A Yes.</b></p> <p>16 Q So, everyone on your handwritten document,</p> <p>17 which is Exhibit 26-A, so everyone listed there would</p> <p>18 have been Tier 1 Team Members. Is that a fair</p> <p>19 characterization?</p> <p>20 MS. McGRAW: Objection, mischaracterizes.</p> <p>21 I think it's right on the face of the document. Did</p> <p>22 you see the word "remote"?</p> |
| <p style="text-align: right;">90</p> <p>1 <b>A Yes.</b></p> <p>2 <b>BY MR. DIEHL:</b></p> <p>3 Q What are those?</p> <p>4 <b>A They're -- in addition to Human Resources,</b></p> <p>5 <b>we have operations groups like Facilities that support</b></p> <p>6 <b>the health system. The police department supports the</b></p> <p>7 <b>health system, some of -- some -- in some capacity.</b></p> <p>8 <b>I'm trying to think of -- those are -- those are what</b></p> <p>9 <b>I know off the top of my head.</b></p> <p>10 Q In 2021, there was -- or I guess, I've seen</p> <p>11 reference to Tier 1 Team Members. Do you recognize</p> <p>12 that term?</p> <p>13 <b>A Yes.</b></p> <p>14 Q What does it mean?</p> <p>15 <b>A Tier 1 have been designated because of the</b></p> <p>16 <b>nature of their job as requiring to comply with our</b></p> <p>17 <b>OCH-002, or whatever it is, the employee health policy</b></p> <p>18 <b>for the medical center.</b></p> <p>19 Q And so other than having to comply with the</p> <p>20 policy, what is -- how would one define Tier 1 Team</p> <p>21 Members, or who those people are?</p> <p>22 <b>A Tier 1 Team Members are those that</b></p> | <p style="text-align: right;">92</p> <p>1 MR. DIEHL: There you go. Well, then I</p> <p>2 mean -- I guess, maybe I should ask the witness to</p> <p>3 answer.</p> <p>4</p> <p>5 BY MR. DIEHL:</p> <p>6 Q Are -- is everyone listed on the exhibit --</p> <p>7 this is these ones now. Is everyone listed on</p> <p>8 Exhibit 26-A Tier 1 Team Members?</p> <p>9 <b>A Yes, unless they're designated as remote.</b></p> <p>10 Q So everyone other than the 30 remote</p> <p>11 individuals?</p> <p>12 <b>A Yes.</b></p> <p>13 Q Well, I guess -- well, so if -- so the only</p> <p>14 individuals that would have applied for a religious</p> <p>15 exemption through VaxTrax would have been Tier 1 Team</p> <p>16 Members or remote team members. Is that fair?</p> <p>17 MS. McGRAW: Object to the form.</p> <p>18 BY MR. DIEHL:</p> <p>19 Q Let me ask you this, just to understand</p> <p>20 this, although I'm being confused. OCH-002 applied to</p> <p>21 Tier 1 Team Members; is that right?</p> <p>22 <b>A Yes.</b></p>   |



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| <p>93</p> <p>1 Q And so, was it also applied to individuals</p> <p>2 that are not Tier 1 Team Members in 2021?</p> <p>3 MS. McGRAW: Objection, beyond the scope.</p> <p>4 But you can respond if you know.</p> <p>5 A Not -- I don't know.</p> <p>6 BY MR. DIEHL:</p> <p>7 Q Okay.</p> <p>8 A Can I -- can I make a comment I think that</p> <p>9 might help with this a little bit? Unless you don't</p> <p>10 want me to.</p> <p>11 Q This one time, yes.</p> <p>12 A So, the way that the, the positions are</p> <p>13 determined Tier 1, um, the job profile or the job</p> <p>14 title may indicate that somebody is a Tier 1, but then</p> <p>15 when we look at where they're actually working, that</p> <p>16 may take them out. So these remote workers, that was</p> <p>17 part of the discussion. Like if they're -- I don't</p> <p>18 even know if I could think of -- if they were an IT</p> <p>19 position --</p> <p>20 Q Yeah. I want to ask a question related to</p> <p>21 that, but I just -- I don't want to lose my train of</p> <p>22 thought.</p>   | <p>95</p> <p>1 scope. Go ahead.</p> <p>2 A To my knowledge, yes. They were notified</p> <p>3 that the exemption was not -- was approved because</p> <p>4 they were remote, for example.</p> <p>5 BY MR. DIEHL:</p> <p>6 Q Well, do you know of any examples other</p> <p>7 than remote employees that were notified as you</p> <p>8 referred to it?</p> <p>9 A Not to my knowledge, no.</p> <p>10 MR. DIEHL: No further questions.</p> <p>11 MS. McGRAW: I have just a little bit of</p> <p>12 follow-up, but I need a few minutes.</p> <p>13 MR. DIEHL: Okay.</p> <p>14 (Recess taken, 11:50 a.m. to 11:55 a.m.)</p> <p>15 MR. DIEHL: We were just talking off the</p> <p>16 record briefly that -- well, we weren't certain if we</p> <p>17 put on the record, that there were extra pages on</p> <p>18 Exhibit 22 that was just a duplicate of the actual</p> <p>19 exhibit. There were just two copies of it. So we've</p> <p>20 corrected that exhibit to make it one exhibit, or one</p> <p>21 copy of the amended interrogatory answer that is</p> <p>22 Exhibit 22. And counsel and I looked at that</p> |
| <p>94</p> <p>1 A Okay.</p> <p>2 Q If a, an individual's title -- is it job</p> <p>3 performance, or title? What did you say that would</p> <p>4 designate them as Tier 1?</p> <p>5 A Job profile --</p> <p>6 Q Job profile.</p> <p>7 A -- could be one factor, yes.</p> <p>8 Q Okay. So, if -- let's say in 2021, if an</p> <p>9 individual's job profile identified them as a Tier --</p> <p>10 well, so step back.</p> <p>11 In 2021, there may have been individuals</p> <p>12 who were designated as Tier 1 Team Members, and would</p> <p>13 have applied for religious exemption, but then it</p> <p>14 turns out that their job -- they're not actually a</p> <p>15 Tier 1 Team Member because of some particular duties,</p> <p>16 or because of their particular job. Is that fair?</p> <p>17 A Yes.</p> <p>18 Q And in 2021, were individuals told that,</p> <p>19 that, you know, we're not -- you applied for a</p> <p>20 religious exemption, but you didn't actually need one,</p> <p>21 because you're not actually a Tier 1 Team Member?</p> <p>22 MS. McGRAW: Object to the form, beyond the</p> | <p>96</p> <p>1 together, and the document is correct as currently,</p> <p>2 with the court reporter, for Exhibit 22.</p> <p>3 MS. McGRAW: Correct.</p> <p>4 EXAMINATION BY COUNSEL FOR DEFENDANT THE RECTOR AND</p> <p>5 VISITORS OF THE UNIVERSITY OF VIRGINIA</p> <p>6 BY MS. McGRAW:</p> <p>7 Q Okay. Ms. Hoffman, I'm going to ask you to</p> <p>8 look at the exhibit, it's one of the sub exhibits in</p> <p>9 26. The training document. Is it your understanding</p> <p>10 that this document lays out sort of the structure and</p> <p>11 process for what we call the 2021 review process?</p> <p>12 MR. DIEHL: Objection, leading, beyond the</p> <p>13 scope of my examination. Counsel's providing the</p> <p>14 answers to questions.</p> <p>15 BY MS. McGRAW:</p> <p>16 Q You can respond.</p> <p>17 A Yes.</p> <p>18 Q And I'm going to go ahead and have this</p> <p>19 marked as Defense Exhibit 3.</p> <p>20 MR. DIEHL: I'm going to object to marking</p> <p>21 an exhibit that is beyond the scope of the</p> <p>22 examination, and appears to be prepared testimony, or</p>               |



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| <p style="text-align: right;">97</p> <p>1 part of prepared testimony, because we did not talk</p> <p>2 about this today, so we're not examining the witness</p> <p>3 on anything that was discussed during my examination.</p> <p>4 MS. McGRAW: The 2022 procedure was</p> <p>5 discussed during your examination over objection, and</p> <p>6 so we'll be addressing it here.</p> <p>7 MR. DIEHL: So -- but so now you're</p> <p>8 withdrawing your objection on the 2022 process?</p> <p>9 MS. McGRAW: I allowed you to ask the</p> <p>10 question, so I'm going to ask some follow-up.</p> <p>11 MR. DIEHL: Well, I intentionally did not</p> <p>12 ask further questions, because I want a witness that's</p> <p>13 prepared to testify about that topic. And I -- I'm</p> <p>14 not -- I'm going to object to this, because you're</p> <p>15 using your objection to your advantage now, because I</p> <p>16 wasn't prepared -- you know, because the witness is</p> <p>17 not prepared to talk about, I did not ask questions</p> <p>18 about it, and I don't think I should ask questions</p> <p>19 about it to a witness who's not prepared to testify on</p> <p>20 behalf of UVA in this deposition. And now counsel,</p> <p>21 notwithstanding her -- UVA's position that this</p> <p>22 testimony is not proper within this deposition, is now</p> | <p style="text-align: right;">99</p> <p>1 2022 procedure?</p> <p>2 A Yes.</p> <p>3 Q And the other exhibit that we were looking</p> <p>4 at -- and I'm sorry, I keep forgetting the sub-exhibit</p> <p>5 number, the training document?</p> <p>6 A Yes.</p> <p>7 Q What's the, what's the exhibit number on</p> <p>8 that one?</p> <p>9 A 26-C.</p> <p>10 Q And is it your understanding, as a</p> <p>11 representative of UVA, that that's the training --</p> <p>12 that's the process and procedure that the members of</p> <p>13 the 2021 committee used to review exemptions under the</p> <p>14 2021 review process?</p> <p>15 A Yes.</p> <p>16 Q Okay. And do you defer to those two</p> <p>17 documents as to any differences between the process in</p> <p>18 the procedure and the analysis that was done?</p> <p>19 A Yes.</p> <p>20 MR. DIEHL: Objection, vague, leading.</p> <p>21 MS. McGRAW: No further questions.</p> <p>22 MR. DIEHL: And notwithstanding that</p>   |
| <p style="text-align: right;">98</p> <p>1 going to ask for testimony prepped by counsel? Is</p> <p>2 that what's going on, counsel?</p> <p>3 MS. McGRAW: I don't think any -- first of</p> <p>4 all, nothing's prepped by counsel. As you know, I</p> <p>5 left her in the room when I went to talk to my</p> <p>6 co-counsel.</p> <p>7 MR. DIEHL: Nothing prepped by counsel</p> <p>8 today I should say.</p> <p>9 MS. McGRAW: If you would withdraw the</p> <p>10 question and answers regarding the 2022 procedure, I</p> <p>11 don't need to go further.</p> <p>12 MR. DIEHL: Let's go off the record.</p> <p>13 (Recess taken, 11:58 a.m. to 12:00 p.m.)</p> <p>14 (Exhibit D-3 was marked for identification</p> <p>15 and attached to the transcript.)</p> <p>16 BY MS. McGRAW:</p> <p>17 Q Okay. We've just marked as Defense</p> <p>18 Exhibit 3 what we've referred to as the 2022</p> <p>19 procedure. Are you familiar with this document?</p> <p>20 A Yes.</p> <p>21 Q And is this a true and correct copy of the</p> <p>22 procedure and guidance that you followed under the</p>   | <p style="text-align: right;">100</p> <p>1 testimony, we spoke off the record, Plaintiff</p> <p>2 preserves our concern and my comments with respect to</p> <p>3 the preparation of the witness in the scope of that,</p> <p>4 but -- and we don't waive that by that, but appreciate</p> <p>5 counsel's cooperation in working through our</p> <p>6 difference of opinion on that.</p> <p>7 MS. McGRAW: And all parties are reserving</p> <p>8 all rights.</p> <p>9 MR. DIEHL: Absolutely.</p> <p>10 MS. McGRAW: We will read and sign.</p> <p>11 THE REPORTER: And will you please state</p> <p>12 your transcript orders?</p> <p>13 MS. McGRAW: I would like full and</p> <p>14 condensed with exhibits, electronic only.</p> <p>15 MR. DIEHL: I would like it expedited a</p> <p>16 little bit. Since it's so short, would it be really</p> <p>17 hard to get it on Thursday?</p> <p>18 MR. KIRSNER: I would like a full and</p> <p>19 condensed and E-Tran also, please. Thanks.</p> <p>20 MR. DIEHL: Oh. And I don't know if I've</p> <p>21 said this before, but I really just need a TXT</p> <p>22 electronic file, but a lot of times they just send PDF</p> |

CONTAINS CONFIDENTIAL DOCUMENTS

Transcript of Kathleen (Katy) Hoffman, Corporate Representative 26 (101 to 104)

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1 too. That's fine. I don't mind the PDF, but the  
2 thing I really need is the TXT electronic file.

3 THE REPORTER: Okay. Do you-all want it  
4 expedited as well?


5 MS. McGRAW: No.  
6 (Off the record, 12:02 p.m.)  
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1 CERTIFICATE OF SHORTHAND REPORTER-NOTARY PUBLIC

2 I, Michelle L. Lonas, RPR, CCR, the officer  
3 before whom the foregoing deposition was taken, do  
4 hereby certify that the foregoing transcript is a true  
5 and correct record of the testimony given; that said  
6 testimony was taken by me stenographically and  
7 thereafter reduced to typewriting by me; that reading  
8 and signing was requested; and that I am neither  
9 counsel for, related to, nor employed by any of the  
10 parties to this case and have no interest, financial  
11 or otherwise, in its outcome.

12 IN WITNESS WHEREOF, I have hereunto set my  
13 hand and affixed my notarial seal this 11th day of  
14 September, 2024, in Shenandoah County, Virginia.

15  
16   
17 Michelle L. Lonas, Notary Public #169569  
18 Commonwealth of Virginia at Large  
19 REGISTERED PROFESSIONAL REPORTER  
20 CERTIFIED COURT REPORTER #0313254

21  
22 My commission expires on the 31st day of May, 2027.

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Transcript of Kathleen (Katy) Hoffman, Corporate Representative

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Transcript of Kathleen (Katy) Hoffman, Corporate Representative

Conducted on September 6, 2024

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